Policy Statement 2026

Modern Slavery & Human Trafficking Statement

Our Commitment

The Company continues to have a zero-tolerance approach to any form of modern slavery. 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 chains.

In May 2024, we launched our updated purpose, mission and values. Our purpose is to create a healthier, safer and more beautiful world, with our mission of being the market leader and trusted partner for clients.



We are committed to developing, training, and retaining our people. Nurture Group is a Real Living Wage employer and is committed to providing opportunities for apprentices within customer communities.

This statement is prepared for the purpose of Section 54 (1) of the Modern Slavery Act 2015 and forms our Modern Slavery statement for end of the financial year 2025. It sets out the steps taken by The Nurture Group, to help prevent slavery and human trafficking within our business and its supply chain. The Nurture Group views the steps being taken as an evolving process and will continue to monitor and review its risk profile to improve and strengthen its practices moving forwards.

Our Business Structure

Founded in 2008, The Nurture Group is a UK-based, privately-owned horticultural and green workplace service provider. With over 4,000 employees and numerous regional depots, we deliver a range of services including grounds maintenance, landscape construction, arboriculture, exterior and interior plant displays, winter gritting and pest control.

Headquartered in Windlesham, Surrey, The Nurture Group is a multi-award-winning, nationwide service provider encompassing four well established brands, delivering 'one stop' integrated services to a diverse client base across the UK.

Nurture Landscapes Ltd provides grounds maintenance, interior & exterior plant displays, winter gritting and green solutions to clients predominantly within the corporate and MoD sectors.

Gavin Jones Ltd provides landscape construction services to commercial and private clients and landscape maintenance services largely to the commercial sector, but also including government and MoD sites, public open spaces, and university campus estates.

Meanwhile, Nurture Pest Services Ltd is one of the UK's leading pest control companies serving commercial, domestic, MoD and public sector clients.

Gristwood & Toms Ltd joined the Nurture Group in 2024 providing excellence in arboriculture services.

Tivoli Group Ltd completes the Group, joining in November 2024 providing grounds maintenance, interior & exterior plant displays and green solutions to clients within the corporate sector.

Our Supply Chains

We are committed to a direct delivery model with minimal use of sub-contractors. The use of sub-contractors is limited to specialist tasks or where the volume of work means it is economically unviable to serve through direct supply. All suppliers and subcontractors are subject to a rigorous, risk-based onboarding process to ensure compliance with our standards, guided by the Modern Slavery Framework and Home Office best practices.

Our expectation continues to be in accordance with the provisions of the Modern Slavery Framework and is based on best practice and guidance issued by the Home Office which we have adopted.

Our approach is focused on:

- Governance and leadership
- Policy and procedure
- Awareness and Training
- Prevention
- Monitoring and Reporting
- Supplier Audit and Management

Our supplier onboarding includes a standardised new supplier questionnaire to assess their modern slavery policies, and we have recently carried out an audit to ensure: (For UK based sub-contractors and suppliers)

1. (For International Suppliers) They pay their colleagues any prevailing minimum wage applicable within their country of operations.
2. That right to work checks are conducted to ensure that anyone carrying out work on our behalf has the right to work in the UK.
3. We will conduct regular reviews of suppliers through auditing and supplier meetings.

Our long-term relationship with uniform providers ensures their compliance with the Modern Slavery Act within their supply chain. Recruitment is handled through reputable agencies, overseen by our People Team, and the direct delivery model minimises subcontractor use. This year we are also engaging with a workforce management supplier whose software helps ensure that the recruitment agencies we engage with are compliant with our modern slavery standards. We have launched a successful trial of the workforce management system in a region of the business and are now planning a full roll out of the system into the whole business.

Our Policies and Procedures

At Nurture, we are dedicated to preventing modern slavery and unethical treatment throughout our workforce and supply chain. To achieve this, we operate a series of internal and supplier policies, including:

- Modern Slavery and Human Trafficking Statement
- Safeguarding Policy
- Anti-Bribery Policy
- Supplier Code of Conduct
- Equality, Diversity & Inclusion Policy
- Ethical Conduct Guidelines
- Recruitment Policy

- Whistleblowing Policy
- Grievance Policy
- Bullying and Harassment Procedures

Evaluating our Performance - We have three 'lines of defence'

To assess our performance, we have implemented a **three lines of defence** approach:

1. **First Line** – Management and colleagues adhere to their roles and responsibilities daily. Colleagues can report concerns directly to their line managers, HR, or through our dedicated confidential reporting hotline. The hotline is monitored by an independent third party to ensure anonymity and objectivity.
2. **Second Line** –We participate in regular client audits in relation to Modern Slavery as part of our continued commitment to continuous improvement and heightened awareness. Our HR team conduct annual audits for UK Right to Work regulations, reflecting our commitment to ensuring all colleagues have the legal right to work in the UK. To further strengthen oversight, we are introducing this year an online training matrix. This new system allows us to monitor training progress more efficiently, ensuring that key compliance areas, such as Modern Slavery and Right to Work, are being addressed across all levels of the business.
3. **Third Line** – We have strengthened our whistleblowing and grievance mechanisms, ensuring they are both accessible and transparent for all stakeholders, including colleagues, suppliers, and contractors.

Management and Reporting Assurance

- Monthly reporting to the **Risk and Compliance Board**.
- Publicly publishing our statement on our website to uphold accountability for continuous improvement.
- HR and legal due diligence for all acquisitions to ensure compliance.

In line with the latest recommendations from the UK government and international guidelines, we will regularly assess the effectiveness of our reporting systems. This includes conducting annual audits to ensure all whistleblowing reports are thoroughly investigated and resolved. Additionally, all whistleblowing cases related to modern slavery will be reviewed by our Risk and Compliance Board, ensuring appropriate action is taken.

Zero Tolerance

The Nurture Group enforces a **zero-tolerance** policy towards illegal working. As part of our onboarding process, we follow Home Office guidance to ensure all colleagues have the legal right to work in the UK. Our checks include:

- Right to work verification on or before the first day of employment.
- Personal bank account requirements for salary payments, with action taken on any discrepancies.
- Disciplinary action resulting in dismissal in cases of breaches of the Modern Slavery Act or our Code of Conduct.

Training & Awareness

We are committed to ensuring that our efforts to prevent modern slavery and human trafficking evolve in line with emerging best practices and legislation. To that end, we will continue to update and refine our training programs annually. This includes mandatory training for all management and business support employees within their first 90 days and annual refresher courses for existing staff.

Our training incorporates the latest global developments in anti-slavery practices. These sessions are tailored to reflect our evolving risk profile and include:

- Updates on international regulatory changes, such as the EU's new regulations on forced labour and the UK's latest Modern Slavery Act guidance.
- Specialised training for departments with a higher exposure to supply chain risks, ensuring all colleagues are well-equipped to identify and respond to modern slavery concerns.
- A full training needs analysis for all acquisitions, ensuring mandatory training is completed during transitions.

Measuring Effectiveness

Our internal policies and procedures give us confidence that our direct workforce is free from modern slavery and human trafficking. Through diligent supply chain management, we ensure compliance and effectiveness.

Nurture group is committed to continuous improvement within supply chain due diligence. From Autumn 2024 we have increased the level of pro-active checking of our supplier's adherence to Modern Slavery laws. Partnering with an accredited SSIP agent, not only will all our suppliers be prequalified against their commitment to following the Modern Slavery Act, but the top 200 will be annually audited to ensure they remain committed by sharing their policy with us. These 200 suppliers give us coverage of 70% of our supply base by annual spend.

Corporate Responsibility

The Nurture Group believes in increased transparency in the fight against slavery and human trafficking. Our operating model and established controls significantly reduce the risk of modern slavery. With multiple layers of scrutiny, we ensure continuous improvement and best practices. We also seek to build partnerships with expert bodies in this area.

We will maintain our commitment to monitoring and enhancing the effectiveness of our policies, procedures, and training, ensuring a safer and more ethical environment for all.

This statement is reviewed annually and has the approval of the Executive Board of Directors of The Nurture Group.

Name: Date: September 2026

Signed: Peter Fane



Position: Nurture Group Founder

For and on behalf of the Nurture Group.