

## **MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2019/2020**

### **Purpose**

We know that Modern Slavery encompasses slavery, servitude, human trafficking, forced and compulsory labour. This is our 3<sup>rd</sup> statement and is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Nurture Landscapes Group Ltd (“Nurture”) have taken to prevent modern slavery and human trafficking in its business and supply chain.

### **Our Commitment**

The Company has 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.

### **Our Business Structure**

Nurture Landscapes was established in 2008 with a simple strategy:

1. Focus on landscape maintenance for the corporate and private sector.
2. Offer best in class customer service delivered by permanent staff who invest time to understand our client’s business.
3. Champion care for the environment.

In 2018, we acquired Gavin Jones Ltd. Gavin Jones was established in 1919 and continues to trade as Gavin Jones within Nurture Landscapes Group.

12 years on we remain a UK based business to business landscape service provider operating nationally with the support of around 1300 employees via 48 regional depots covering the full grounds maintenance services of exterior and interior landscaping, snow clearance and gritting, floristry, Christmas trees, arboriculture and design and build.

### **Our Supply Chains**

We seek to build lasting relationships with our suppliers and sub-contractors and have identified that they are key to our service delivery as well as our commitment to our Modern Slavery and Human Trafficking Policy.

Our expectation continues to be in accordance with the provisions of the ETI Base Code <https://www.ethicaltrade.org/eti-base-code>, which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice as follows;

- Employment is free chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- Child labour shall not be used

- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

In addition, we seek confirmation from our suppliers and sub-contractors that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the National Living Wage.
4. (For International Suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Our supply chain is primarily UK based with the remainder being EU suppliers. These countries remain generally recognised as being at lower risk of Modern Slavery.

### **Our Policies and Procedures**

At Nurture we are committed to ensuring there is no modern slavery, human trafficking or unethical treatment of our employees or in any part of our supply chain. In our commitment to this we operate several internal policies (detailed in the Employee Handbook) and supplier policies that work in isolation and in combination to ensure that we are conducting business in an ethical and transparent manner. These include.

- Modern Slavery and Human Trafficking Policy
- Anti-Bribery Policy
- Modern Slavery and Human Trafficking Suppliers Code of Conduct
- Equality
- Dignity at Work
- Ethical conduct
- Recruitment Policy
- Whistleblowing Policy
- Grievance Policy
- Bullying and Harassment procedure

Underpinning all these policies is the Nurture's Values **GROWS** that stands for.

G - Gardeners who care

R- Respect

O- Ownership

W- Word is our bond

S- Safety

### **Our due diligence and risk assessment**

Nurture has a zero tolerance to illegal working and our onboarding procedure follows the Home Office guidance. Right to work checks are conducted to ensure that our employees are lawfully in the UK and have the right to work. Action is taken if issues are identified.

We use well know and long-established recruitment agencies or direct recruitment methods which we believe reduce the risk of modern slavery in our work teams.

We have a long-established relationship with our uniform providers and have received confirmation that they are fully compliant with the Modern Slavery Act themselves and within their own supply chain.

We continue to operate a robust sub-contractor questionnaire to assess their compliance with the Modern Slavery Act.

Our standard supply chain contract includes automatic termination of the contract in the event of any breach of the Act or our Code of Conduct.

### **Measuring Effectiveness**

With the application of our internal policies and procedures, we remain confident that our direct workforce is free from slavery and human trafficking.

The measures we have in place regarding our supply chain due diligence demonstrates that we have fulfilled our obligation to date.

Additionally, we will know the effectiveness of the steps we have taken to mitigate the risk if no validated reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified, which we could have identified from our processes and procedures.

### **Training**

We continue to provide training and guidance to the relevant staff in the policies that we have identified above to ensure they are aware of their overall responsibilities. We have designed and undertaken bespoke training. Our aim is to conduct a review and offer refresher training as and when identified.

#### Responsibility, Implementation and Approval of the statement

The Company Board of Directors have approved this statement at their board meeting held on Wednesday 23<sup>rd</sup> September 2020.

Signature:



Peter Fane  
Managing Director

Date: 23/9/2020