

### **Purpose**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and provides an update on the steps that Nurture Landscapes Group Ltd (“Nurture”) have taken during its financial year ending 31<sup>st</sup> March 2021 to prevent modern slavery and human trafficking in its business and supply chain.

### **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.

Our core values of integrity, pride, and respect shape how we build our business and how we interact with our colleagues, clients, supply partners, employees, and the environment.

### **Our Business Structure**

Our business structure hasn't changed since the previous financial year. Since we were established in 2008, we remain a UK based privately owned 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.

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

In March 2021, Nurture Landscapes launched its new vision, mission, and values. Our vision is to be the leading green service provider achieving carbon neutrality by 2030 and we will do this by delivering sustainable, industry leading green services and nurture lasting relationships with our clients, colleagues, and supply partners.

### **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 to our existing questions relating to modern slavery, we will be including the following additional questions to our suppliers and sub-contractor questionnaires to ensure that:

1. (For UK based sub-contractors and suppliers) They pay their employees at least the National Living Wage.
2. (For International Suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
3. That right to work checks are conducted to ensure that anyone carrying out work on your behalf has the right to work in the UK.

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

### **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 known 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 have provided training to relevant members of staff. 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 Friday 24<sup>th</sup> September 2021

Signature:

A handwritten signature in blue ink, appearing to read 'P. Fane', is written over a faint dotted line.

**Peter Fane**  
**Chief Executive Officer**

**Date: 6th September 2021**