

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2023

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 'RAPID'

Respect	for others and the environment.
Accountability	for delivery of goals.
Pride	in the work that we do.
Integrity	because our word is out bond.
Diversity	we include and value all our colleagues equally.

Shape how we continue to grow our business and how we interact with our colleagues, clients, supply partners, and the environment.

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 2023. 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

Since we were established in 2008, we remain a UK based privately owned business to business landscape service provider operating nationally directly employing 2,300 colleagues via numerous 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 The Nurture Group. We diversified further in 2022 by acquiring our first Pest Control business Rokill, and in 2023 we have made several new acquisitions which will strengthen our presence in the North and Midlands.

In May 2023, The Nurture Group launched its new vision, mission, and values. Our mission evolving 'To be recognised as Number 1 in our core markets', and our purpose 'we make Britain a more beautiful and safer place'. This will be achieved by delivering ethical, sustainable, industry leading green services, and nurture lasting relationships with our clients, colleagues, and supply partners.

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 Nurture Group companies work to the same standards, framework and due diligence when choosing new suppliers, and we apply a risk-based approach to the onboarding of new subcontractors and suppliers.

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

- Governance and leadership
- Policy and procedure
- Awareness and Training
- Prevention

- Monitoring and Reporting
- Supplier Audit and Management

Over the last year we have introduced a standardised "new supplier questionnaire" requesting documentation and evidence of their modern slavery policy. We will continue to strengthen our supplier audit programme and will ensure that:

1. (For UK based sub-contractors and suppliers) They pay their colleagues at least the National Living Wage.
2. (For International Suppliers) They pay their colleagues 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.
4. We will conduct regular reviews of suppliers through auditing and supplier meetings.

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 use reputable agencies for recruitment, any new agencies are approved by our central People Team. Our Direct Delivery model will continue to minimise the use of sub-contractors.

Our Policies and Procedures

At Nurture, we are committed to ensuring there is no modern slavery, human trafficking or unethical treatment of our colleagues or in any part of our supply chain. In our commitment to this we operate several internal policies (detailed in the Colleague 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 Statement
- Safeguarding Policy
- Anti-Bribery Policy
- Modern Slavery and Human Trafficking Suppliers Code of Conduct
- Equality Policy
- Ethical conduct
- Recruitment Policy
- Whistleblowing Policy
- Grievance Policy
- Bullying and Harassment procedure

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

First Line of Defense

- Management and colleagues in their everyday roles

Second Line of Defense

- In Q1 2023 we completed a full UK Right to Work audit of over 1,800 people
- Monthly training audit completed for management for action with additional scrutiny at our Risk and Compliance Board

Third line of defense

- We encourage 3rd Party and stakeholder scrutiny and feedback.
- Several Customer audits completed in FY23 and due diligence by our Private Equity Investor.

Management and Reporting Assurance

- Monthly Report to Risk and Compliance Board
- We publish our statement on our website, to hold ourselves to account to continuous improvement.
- We investigated 3 (non-Modern Slavery) Whistleblowing cases in the past 18 months.
- We assure through HR and legal due diligence for all acquisitions.

Zero Tolerance

Nurture has a zero tolerance to illegal working and our onboarding procedure follows the home office guidance.

- Right to work checks are conducted either prior or on day one of the onboarding process to ensure that our colleagues are lawfully in the UK and have the right to work. We also carry out reference checking and where applicable DBS checks.
- All colleagues must have their own personal bank account, payments will not be made anywhere else. Action is taken if any issues that are identified.
- 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.

Training & Awareness

We continue to improve our training across the company by;

- Cross business training led by an improved Learning and Development Team.
- All courses include feedback questionnaires to highlight any individual concerns.
- Introduced E-learning suite in 2022 covering key compliance training.
- Including Modern Slavery and Whistleblowing as two of 10 mandatory courses completed within the first 90 days.
- Modern Slavery is included in all new colleague induction.
- We have published multiple safe channels for reporting, internal, confidential routes, and a Modern Slavery Helpline.
- We delivered 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 now reviewed annually, and refresher courses are issued for completion as necessary.
- We will continue to make our training more accessible for our front-line colleagues.

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 colleagues, 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.

Corporate Responsibility

The Nurture Group believe that increased transparency in how businesses are playing their part in preventing slavery and human trafficking.

- Nurture 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

We will continue to monitor and improve the effectiveness of our policies, procedures, and training in preventing modern slavery for our colleagues, clients, supply partners, and the environment.

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

Signed:

Name:

For and on behalf of The Nurture Group.

Dated: