

## **MODERN SLAVERY ACT 2015**

### **STATEMENT FOR FINANCIAL YEAR 2021**

#### **INTRODUCTION**

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 in order to exploit them for personal or commercial gain.

The Alan Nuttall Partnership is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our customers, contractors, suppliers and other business partners and we expect that our suppliers will hold their own supply chains to the same high standards.

As a commitment to eradicate modern slavery, this statement sets out the steps that The Alan Nuttall Partnership Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or our supply chain.

#### **COMPANY STRUCTURE**

The Alan Nuttall Partnership Ltd is a successful business operating through two brands; Nuttall and Flexeserve®. Manufacturing facilities are based at Dudley, West Midlands and Hinckley, Leicestershire.

During the 2021 financial year, 1<sup>st</sup> January 2021 - 31<sup>st</sup> December 2021, company turnover stood at £40 million. The number of Partnership members employed was less than 250 and is therefore consistent with an SME. During 2021, the supply chain procurement breakdown was as follows; 75% UK, 18% EU and 7% non-EU.

#### **OUR POLICIES**

We operate a number of policies to ensure that we are conducting business in an ethical and transparent manner, these include;

- **Modern Slavery and Anti-trafficking Policy** which sets out our stance on modern slavery and explains how Partnership members can identify instances and where they can go for help.
- **Human Rights Policy** demonstrates our respect for all fundamental human rights provisions in line with the United Nations Universal Declaration of Human Rights.
- **Anti-Bribery and Corruption Policy** sets out the Partnership's requirements and restrictions in relation to bribery and corruption.
- **Ethical Guidelines Policy** setting out our stance in respect of objectivity, confidentiality, conduct, conflicts of interests and independence.

- **Anti-Harassment & Bullying Policy** outlining the Partnership's stance on bullying and harassment both in and out of the workplace.
- **Equal Opportunities Policy** promoting equality of opportunity for all.
- **Grievance Policy** outlining how issues can be raised both informally and informally.
- **A Partnership Council** where Partnership members can raise issues of concern with their Partnership representative, anonymously if preferred, and the matter will be addressed and/or taken up with the Board of Directors. If the matter is not dealt with satisfactorily, it can be escalated to the Board of Trustees.
- **Whistleblowing Policy** - operates so that all Partnership members know they can raise concerns about how colleagues are being treated or practices within our business or supply chain without fear of reprisals.

### **SEDEX MEMBERS ETHICAL TRADE AUDIT (SMETA)**

In 2019, the Partnership underwent a successful audit as recorded on the Supplier Ethical Data Exchange (SEDEX) portal. In mid-2022, The Alan Nuttall Partnership is due a further SMETA audit. The 2019 audit covered; management systems and code implementation, responsible recruitment, entitlement to work and immigration, sub contract and home working.

### **ETHICAL TRADE INITIATIVE - BASE CODE**

Also, in 2019, the Partnership committed to the ETI Base Code which is an internationally recognised set of labour standards based on ILO conventions. It is used by ETI members and others to drive improvements in work conditions around the world with the following principles;

- Employment is freely chosen.
- Freedom of association and right to collective bargaining.
- Working conditions are safe and hygienic.
- Child labour shall not be used.
- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practised.
- Regular employment is practised.
- No harsh or inhumane treatment.

### **SUPPLY CHAIN - DIRECT LABOUR PROVIDERS**

As part of our due diligence process, we initially focussed on direct labour providers taking the following action;

- Conducting audits to include a visit to premises, interviews and view documentary evidence.
- Improved induction process, including production of original ID on first day, right to work checks, checks that workers are paid into their own bank account, working of their own free will and assurance that no fees have been paid to any agency by the worker.
- Human Rights Awareness Training delivered by HR to all agency workers on their first day and details of reporting processes.

## **TRAINING**

A training programme initially rolled out to shop floor Partnership members, Supervisors and Managers and covering the following;

- Human Rights.
- ETI (Ethical Trading Initiative) Base Code.
- Equal Opportunities.
- Modern Slavery.
- Whistleblowing.
- Anti-Bribery and Corruption.
- Bullying and Harassment.
- Grievance.
- Disciplinary.

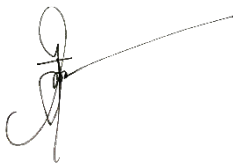
This was then re-enforced by the use of Human Rights notice boards located in the main access corridor for Partnership members, agency workers and visitors displaying all policies, ETI and Modern Slavery posters and reporting details.

Training and raising awareness remain a key focus for building on our previous achievements along with assessing and mitigating any risks within our supply chain.

Please note, publication of this statement was delayed with the agreement of the Home Office due to the effects of Covid-19 on our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2021.

### **On Behalf of the Board of Directors as a collective**



**Mick Steele**  
Secretary

**The Alan Nuttall Partnership Ltd**  
R3 | 18<sup>th</sup> February, 2022