

## MODERN SLAVERY ACT 2015

### STATEMENT FOR FINANCIAL YEAR 2018

#### INTRODUCTION

The Alan Nuttall Partnership Ltd is committed to preventing slavery and human trafficking throughout our business and those associated with our business. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Alan Nuttall Partnership Ltd has a zero tolerance approach to any form of modern slavery.

This is not a standalone issue but one which forms part of our approach to ensure we treat people with dignity and respect, that we source goods and services responsibly, that we promote and strive for transparency and that we conduct our business with the highest regard to ethical and environmental standards. We are committed to ensuring that all our Partnership members abide by the highest professional and ethical 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 shop fitting, interior solutions and foodservice equipment business operating through three divisions; Store Fitting, Project Solutions and Foodservice Solutions. Manufacturing facilities are based at Hinckley, Leicestershire and Dudley, West Midlands.

#### OUR POLICIES

We operate a number of internal 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 partners 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.
- **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.

#### OUR SUPPLY CHAIN

It is likely our supply chain may employ individuals from outside of the EU and we will review our supply chain to understand if they are taking any appropriate measures to ensure eligibility to work in the UK and that there

are appropriate welfare arrangements on site. The Alan Nuttall Partnership Ltd intends to conduct regular audits and have minimum standards that must be met.

#### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to modern slavery and human trafficking. To ensure all those in our supply chains and contractors comply with our values, we have put together a supplier compliance team which consists of representatives from the following departments;

- A Board Director
- Compliance/QSHE
- Human Resources
- Procurement/Supply Chain
- Sales/Commercial.

#### **DUE DILIGENCE PROCESSES**

As part of our initiative to identify and mitigate risk we are putting in place systems to;

- Identify and assess potential risk areas in our supply chain.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risks in our supply chains.
- Protect whistleblowers.

#### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are putting in place a training programme for all our Partnership members.

#### **STATEMENT**

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 2018.

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



**Darren Emms**  
Secretary

**The Alan Nuttall Partnership Ltd**  
**Effective from February, 2019**