

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the company has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Clifton Nurseries 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 chain.

### **Our Business**

We are a privately owned Nursery and Gardening contractor and our operations are solely based in the UK. The company has its head office in Maida Vale, London.

Our philosophy and objectives enshrine our values: Exceptional Customer Service, Sustainability (economic, environmental and social), Health & Safety, Equality of opportunity, Integrity and Recognition and Reward of our employees.

### **Our Potential Highest Risks**

- Migrant/seasonal/temporary workers engaged at short-notice at pinch-points on projects or during the growing season
- Agency staff
- Jobbing sub-contractors where we have limited knowledge of their operations
- Growers of nursery plant stock

### **Our policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Modern-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### **Our Suppliers & Sub-contractor partners**

We seek to build lasting relationships with our suppliers and are committed to respecting the rights of workers throughout our business including our product and services supply chains.

We operate a supplier policy and maintain a preferred supplier list.

Our expectations are in accordance with the provisions of the [Ethical Trading Initiative 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 freely chosen** – there is no forced, bonded or involuntary prison labour; workers are not required to lodge “deposits” or their Identity papers with their employer and are free to leave after reasonable notice.
- **Freedom of association** – including the right to form or join trade unions without discrimination
- **Working conditions are safe and hygienic** – in accordance with the prevailing knowledge of the industry and specific hazards. Risk assessments and safe method of working are in place and adequate steps taken to prevent accidents and injury to health at work. Workers must receive regular and recorded Health & Safety training and have access to clean toilet facilities and potable water.
- **Child labour shall not be used**
- **Living wages are paid** and all workers to be provided with written and understandable information relating to their employment conditions, including rate and timing of pay.
- **Working hours are not excessive** – compliant with national laws and regulation.
- **No discrimination is practiced** – in relation to hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- **Regular employment is provided** – to every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- **No harsh or inhumane treatment is allowed** – physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

In addition, we seek confirmation from our suppliers and subcontractors 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

### Training

We have formulated a toolbox talk which will ensure all of our staff understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. This will be delivered across our operational and support teams and refreshed at regular intervals. The training will also form part of our induction and a reference included within our staff handbooks.

### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Signed:



Position: Will Clark – Managing Director

Date: 6 January 2025