



## Modern Slavery Act 2015 Statement from the Board of Directors

### **Introduction**

John Nixon Ltd (T/A Nixon Hire) is committed to conducting its business activities in accordance with the highest legal and ethical standards.

Modern slavery is a crime and violation of fundamental human rights. John Nixon Ltd has a zero tolerance to any form of slavery or servitude, forced or compulsory labour or any other form of modern slavery. We are committed to acting ethically and with integrity in all our business dealing and relationships and to implementation and enforcing effective systems and controls to ensure modern slavery is not taking place in our supply chain networks.

John Nixon Ltd is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain consistent with our obligated disclosures under the Modern Slavery Act 2015. We insist on the same high standards from all our suppliers, contractors and other business partners and we expect that our suppliers hold their own suppliers to the same high standards.

### **Policies in relation to human trafficking and slavery**

John Nixon Ltd forbids the use of any unlawful child labour, forced or compulsory labour and/ or servitude in any area of its business. We seek to provide a safe and healthy workplace with conditions and wages that meet and /or exceed any applicable law and regulations.

The company maintains internal accountability standards for both its employees and suppliers. Any employee found to be in violation of these standards will be subject to disciplinary action, including dismissal and any supplier who found in breach of our ethical business expectations is subject to termination of the business relationship.

Our purchasing policies require that direct suppliers certify that materials incorporated into John Nixon Ltd products comply with the laws of the country or countries where such suppliers do business, which would include those addressing human trafficking and slavery.

We strongly oppose slavery and human trafficking and would never knowingly conduct business with contractors, suppliers or employees engaged in such practices.

### **Supply Chain**

This statement reflects our commitment to acting ethically and with integrity. We have implemented effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

To support our compliance with this statement we have in place the following controls and processes:

John Nixon Ltd reviewed its product supply chain to evaluate human trafficking and slavery risks using a heat map to identify the suppliers in the highest risk category based on both geographical location and products being supplied.

To date, we have contacted our suppliers who have provided items made from materials sources outside the UK to ensure they are compliant with the Act.

All suppliers must complete our Supplier Application Form which includes a section on modern slavery and human trafficking which asks

- Do you have a documented Human Tracking / Slavery Policy?
- Do you currently have a processes in place to ensure that human trafficking and slavery do not exist in your operations and supply chain?
- Do you have a written policy for the company standards on human trafficking and slavery for employees, suppliers and contractors?
- Have your management employees, particularly those in charge of supply chain management, been trained to understand what slavery and human trafficking is and how to mitigate the risk of them in their respective supply chains?

Any supplier or potential supplier who fails to answer these questions or meet the necessary requirements is subject to termination of the business relation.

John Nixon already audits its suppliers and contractors for compliance on delivering quality, service and value for money. We expect to extend the audit facility to include modern slavery compliance and whilst we do not do this at present, we shall look to include these requirements during 2018.

John Nixon is also looking to encompass the requirements of the Modern Slavery Act within its forthcoming 'Procurement Code of Conduct' which we anticipate will be completed by the end of 2018.

All John Nixon Ltd contracts with suppliers require the suppliers to comply with all applicable laws. When a supplier accepts our purchase order and/or enters a contract with John Nixon Ltd they are acknowledging and consenting to comply with all laws, which include the legislation for Modern Slavery Act 2015.

## **Our Staff and Training**

The company maintains internal accountability standards for both its employees and suppliers. Any employee found to be in violation of these standards will be subject to disciplinary action, including dismissal.

John Nixon Ltd is working with its employees to ensure high level of understanding of the risks of modern slavery and human trafficking. The company is doing this by:

- Periodically running internal awareness campaign throughout the organisation involving all employees regarding modern slavery, what it is, who it affects and why it matters to John Nixon Ltd.
- Ensuring all staff involved in the supply chain and procurement processes undertake training regarding modern slavery.
- Inform all our suppliers of John Nixon's stance on modern slavery by making the statement available on the company website.

## **Responsibility for the Policy**

The Board of Directors for John Nixon Ltd have overall responsibility for ensuring this policy complies with our legal and ethical obligations and those under our control comply with it.

Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy. They must ensure regular training is provided on the issue of modern slavery both in the work place and in the supply chains.

All employees are responsible for reporting any matter which they feel may have modern slavery implication. Reporting of any modern slavery concerns is positively encouraged and employees are aware of their ethical and moral duty to do this.

John Nixon Ltd will update and publish this Modern Slavery Statement annually.

A handwritten signature in black ink, appearing to read 'G. Nixon', written in a cursive style.

Graham Nixon  
Managing Director on behalf of the Board of Directors  
April 2018