

## **Slavery and Human Trafficking Transparency Statement for the Financial Year 2016**

This Statement is made pursuant to Section 54 (Part 6) of the Modern Slavery Act 2015 ('Act') and sets out the steps that Nichols plc ('Nichols') has taken during the previous financial year to ensure that slavery and human trafficking is not operating within either its own business or its supply chains. Nichols considers that people, whether employees or part of the wider supply chain, are a vital asset to our business and their safety and well-being is of paramount importance.

The Statement has been approved by the Board of Directors and signed by John Nichols, the Non-Executive Chairman of Nichols.

### **Company Overview**

Nichols is an international soft drinks business. Nichols engages with a large number of suppliers, customers, distributors and licensees throughout the United Kingdom and the world. Whilst these organisations are not owned or controlled by Nichols, it nevertheless remains an important requirement that they operate to the same anti-slavery and anti-human trafficking principles applied by Nichols in relation to its own business and to that of its supply chain. For example, it is a contractual requirement that all licensees comply with the highest ethical standards at all times.

### **Nichols' Policies**

Nichols has a number of internal policies in place which uphold its commitment to behave with integrity in all its business dealings. These policies include:

- Conduct and Standard of Behaviour at Work;
- Corporate and Social Responsibility
- Whistleblowing
- Equal Opportunities
- Recruitment
- Anti-Bribery

Nichols strives to ensure that it does not contribute towards adverse human rights impacts through its supply chains. Nichols has an ongoing commitment to engage only those suppliers that uphold the same principles as Nichols and where necessary, ensure the implementation of corrective action measures. In the event that suppliers fail to take steps to cease or prevent adverse human rights impacts, Nichols will reconsider its business relationships with those suppliers.

## **Nichols' Activities in FY2016 related to Prevention of Slavery and Human Trafficking**

### **Supply Chain Management**

In all of its dealings with its suppliers Nichols strives to ensure that the highest ethical standards are reached at all times. As part of this ongoing requirement, there will be increased focus on the requirement for a long term commitment by those suppliers to ensure that slavery and human trafficking does not exist in their own businesses and supply chains.

### **Internal Auditing**

An internal audit of all Nichols direct suppliers has presented us with no immediate concerns. The vast majority of those suppliers are based in the United Kingdom and have been assessed as posing minimal risk in terms of non-compliance with the Act. In the case of those suppliers based abroad or that source goods from high risk countries outside of the UK, the manufacturing and production processes for Nichols products are subject to periodic audit and at present we have no information to suggest there are any issues of concern in this area.

### **Enhanced Contract Protection**

A standard supplier contract clause has been drafted requiring compliance with the Act. In some more pertinent cases this will include enhanced audit/termination rights to ensure more vigilant monitoring of high risk suppliers.

### **Nichols Continued Commitment**

Nichols recognises the importance of maintaining constant vigilance to identify and address any impacts associated with slavery and human trafficking throughout its supply chains. In recognition of the serious nature of these issues, Nichols is committed to continuing to enhance its capacity to identify, prevent and mitigate any actual or potential impacts in this field. Employees will be provided with training to ensure that they understand the company's policy and their responsibilities in this area.

**Approval by Nichols plc's Board of Directors**

I, John Nichols, hereby certify that the information contained in the above FY2016 Slavery and Human Trafficking Transparency Statement is factual and has been approved by Nichols plc's Board of Directors.

Signed: \_\_\_\_\_



Name: John Nichols

Group Non-Executive Chairman

October 2016