



## **Modern Slavery and Human Trafficking Transparency Statement** **for the Financial Year Ended 31 December 2023 ('FY2023')**

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 FY2023 to ensure that slavery and human trafficking is not occurring within either Nichols' own business or supply chains.

Nichols considers that people, whether employees or part of the wider supply chain, are a vital asset to Nichols' business and their safety and well-being is of paramount importance.

This statement has been approved by Nichols' Board of Directors and signed by Liz McMeikan, the Non-Executive Chair 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 Nichols' own business and supply chain. For example, it is a contractual requirement that all licensees comply with the highest ethical standards at all times.

### **Nichols' Environmental, Social and Governance ('ESG')**

Nichols' purpose is to 'Make life taste better' and this means growing Nichols' business in a way that manages Nichols' social and environmental impacts responsibly, and makes Nichols' people and our stakeholders proud.

Nichols' Happier Future ESG Strategic Report and our Progress Report 2023 (copies of which are accessible on Nichols' website) outline Nichols' ESG strategy and share our progress against key objectives.

With respect to governance, Nichols has a number of internal policies in place which uphold Nichols' commitment to behave with integrity in all Nichols' business dealings. These policies include, without limitation:

- Diversity & Inclusion which includes equal opportunities and anti-harassment and anti-bullying;
- Recruitment;
- Whistleblowing;
- Anti-Corruption & Bribery;
- Human Rights and Modern Slavery;
- Sanctions;
- Anti-Money Laundering Counter-Terrorist Financing; and
- Anti-Facilitation of Tax Evasion.

Nichols strives to ensure that it does not contribute towards adverse human rights impacts through Nichols' 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. If any supplier fails to take steps to cease or prevent adverse human rights impacts,

Nichols will reconsider and, if appropriate, terminate its business relationships with the relevant supplier.



## **Nichols' Activities in FY2023 related to the Prevention of Modern Slavery and Human Trafficking**

### **Supply Chain Management**

In all of Nichols' dealings with its suppliers, Nichols strives to ensure that the highest ethical standards are reached at all times. In FY2023 there was continued focus on the requirement to seek a long-term commitment from Nichols' suppliers to ensure that slavery and human trafficking does not, and will not, exist in their own businesses and supply chains.

### **Internal Auditing**

In FY2023, as part of Nichols ongoing supplier assessment and selection process, 21 assessments were carried out against suppliers' policies and procedures relating to the prevention of slavery and human trafficking, and no immediate concerns were raised.

Nichols continues to audit the remainder of its suppliers and has integrated the audits into Nichols' supplier approval and selection processes.

### **Responsible Sourcing**

In order to supplement our assessment process further, a Supplier Code of Conduct has been developed, which we are asking all partners to sign to indicate that they are in agreement with our policies as detailed earlier in this document. During FY2023, 46 of our partners signed the code of conduct. This forms part of our Responsible Sourcing process and policy, which is designed to gather due diligence information from partners in order to assess risks and take appropriate action accordingly. This programme is an ongoing commitment and will continue to develop, forming a fundamental part of existing partner management as well as selection for new partners.

### **Enhanced Contract Protection**

A standard supplier contract clause requiring compliance with the Act has been developed and implemented by Nichols. In some more pertinent cases this includes 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 Nichols' capacity to prevent, identify and mitigate any actual or potential impacts in this field. Nichols has developed training for its employees on human rights, labour rights and modern slavery to ensure that they understand Nichols' policy, procedures and their responsibilities in this area. This training was completed by relevant employees in 2023.



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

I, Liz McMeikan, hereby certify that the information contained in the FY2023 Slavery and Human Trafficking Transparency Statement above is factually correct and has been approved by Nichols plc's Board of Directors.

Signed:

**Liz McMeikan, Group Non-Executive Chair, Nichols plc**  
**14 June 2024**