



HUMAN RIGHTS AND MODERN SLAVERY POLICY

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INTRO

To whom does this policy apply?

- This policy applies to Nichols plc and its subsidiaries ("**Nichols**" or the "**Company**");
- All individuals working for Nichols, including directors, officers, employees (including interns and seconded employees), and independent contractors ("**Nichols Personnel**");
- Nichols' business partners, may be required to comply with this policy under the terms of engagement between them and Nichols. "**Business Partner**" means any person (other than Nichols or Nichols Personnel) providing goods or performing services for or on behalf of Nichols and acting in such capacity, such as agents, suppliers, co-packing partners, licensee partners, consultants, advisers, distributors, resellers, vendors, joint venture partners, contractors and subcontractors.
- Where a Business Partner is required to comply with this policy, references to Nichols Personnel shall be amended to Business Partner as the context requires, and obligations and requirements on Nichols Personnel below shall apply equally to Business Partners where relevant.

What does this policy do?

- This policy demonstrates Nichols' commitment to respect human rights, specifically in relation to detecting, preventing and responding to the risk of modern slavery in its organisation and supply chain.
- It sets out standards of conduct for Nichols and Nichols Personnel to detect, prevent and respond to modern slavery risks.

What you must do

- Nichols Personnel must read, understand and comply with this Policy.
- Nichols Personnel must report known or suspected violations of this Policy to the Legal Director.
- Those with managerial responsibility for others must ensure that their teams are familiar with and comply with this Policy.
- Nichols Personnel must tell the Legal Director immediately if they know of or suspect instances of modern slavery in Nichols' operations or supply chain, including in the operations of its Business Partners.
- If Nichols Personnel are unsure whether a particular act may constitute modern slavery, they should raise such queries with their line manager or the Legal Director.

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Who is responsible for the policy?

- The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The Legal Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and managing the audit of internal control systems and procedures to ensure they are effective in countering the risk of modern slavery.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.
- You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Legal Director.

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POLICY STATEMENT – HUMAN RIGHTS AND MODERN SLAVERY

Nichols is committed to conducting its business with respect for human rights. As part of this commitment, we support the principles enshrined in the International Bill of Rights and the ILO Declaration on Fundamental Principles and Rights at Work. Our approach is guided by the United Nations Guiding Principles on Business and Human Rights ("UNGP") and is supplemented by, and should be construed by reference to, this policy and any implementation guidance.

We are committed to acting with respect for human rights in dealings with our Business Partners and to implementing internal control systems and procedures to detect, prevent and respond to the risk of modern slavery in our organisation and supply chain.

All Nichols entities and Nichols Personnel must uphold all laws relevant to respect for human rights and preventing the risk of modern slavery in all the jurisdictions in which we operate. A failure to do so may place both our reputation and business success in serious jeopardy and may subject Nichols and any Nichols Personnel concerned to serious criminal and civil liabilities, including fines and imprisonment for individuals.

We are committed to transparency about our approach to detecting, preventing and responding to the risk of modern slavery in our organisation and supply chain consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all our Business Partners.

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WHAT IS MODERN SLAVERY?

"**Modern slavery**" is a crime and violation of fundamental human rights. Modern slavery is generally defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after. Common across the various forms of modern slavery described in this paragraph is the exploitation of human beings for the purpose of compelled service through force, other forms of coercion, or fraud.

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YOUR RESPONSIBILITIES

The prevention, detection and reporting of modern slavery risks are the responsibility of all Nichols Personnel.

Nichols Personnel must ensure that they read, understand and comply with this policy. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Legal Director immediately if you believe or suspect that a violation of this policy has occurred, or may occur in the future.

You must conduct proportionate risk-based due diligence on transaction parties or potential transaction parties. Nichols Personnel must follow the Procurement Policies (which incorporate a due diligence procedure), and the Due Diligence process for new International Business Partners.

Nichols should ensure that documents, data and information that it holds are kept up to date. This means that due diligence on continuing contracting parties should be refreshed regularly or otherwise whenever Nichols becomes aware of a significant change in a contracting party's circumstances or develops knowledge or suspicion that the contracting party may be engaged in activity which may be contrary to this policy.

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WHAT YOU MUST NOT DO

It is not acceptable for you (or someone on your behalf) to engage in any activity that might lead to a breach of this policy.

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POTENTIAL RISK SCENARIOS

The following is a list of possible concerns that may arise which may raise concerns related to modern slavery. The concerns below should be considered with reference to Nichols employees or other non-permanent, seasonal or otherwise informal workers as well as those of relevant Business Partners. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these concerns in Nichols or our Business Partners' operations while working for us, you must report them promptly to the Legal Director or use the procedure set out in the [Whistleblowing Policy](#):

- a) instances of forced, bonded or involuntary labour in the supply of goods and services to Nichols;
- b) a fee, financial contribution or other form of financial loan is required for recruitment, processing or placement;
- c) workers are not provided with written terms and conditions of employment and benefits for their review before they begin work or that there are no safeguards in place to ensure that the offered terms and conditions of employment and benefits are maintained once work is commenced;
- d) identity papers (for example, visas, passports, travel papers) are confiscated from workers or who are otherwise not free to leave their employer after reasonable notice in accordance with the law;
- e) workers are prevented from forming or joining trade unions or their right to collectively bargain is restricted. This includes instances of discrimination or harassment of worker representatives or their ability to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted by law, there should be parallel means for independent and free association and bargaining available;
- f) working conditions are unsafe or adequate steps are not being taken to prevent accidents or injury to health and safety arising out of, associated with, or occurring during the course of work, by minimising, so far as is reasonably practicable the causes of hazards in the working environment through management systems, regular training and any other relevant legal requirements. Where accommodation is provided it should be clean, safe and meet basic needs;

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- g) children or young workers below the age of 15 are employed or young workers between the ages of 15 and 18 are engaged in "hazardous work" other than in accordance with the provisions of the relevant ILO standards;
- h) wages are not paid regularly, on time, or in accordance with local law or contractual requirements; and
- i) working hours are required beyond legal limits.

Enhanced consideration to modern slavery risks should be given when transacting with certain **higher risk countries**, including those identified by the Global Slavery Index and the US Department of State Trafficking In Persons Report, including, amongst others, **Pakistan, Turkey, UAE, Ukraine, Mauritania, Afghanistan, Eritrea; Tajikistan; North Macedonia; Kazakhstan; Azerbaijan; and North Korea.**

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HOW TO RAISE A CONCERN

You must raise concerns about any issue or suspicion of modern slavery immediately to your line manager or the Legal Director.

Please refer to our [Whistleblowing Policy](#).

If you are unsure about whether a particular act constitutes modern slavery, confer with your line manager or the Legal Director.

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PROTECTION

Individuals who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of compliance with this policy.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are Nichols Personnel, you should raise it formally with the Legal Director.

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TRAINING AND COMMUNICATION

Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to respect human rights and detect, prevent and respond to the risk of modern slavery in our organisation and supply chain must be communicated to all Business Partners at the outset of our business relationship with them and as appropriate thereafter.

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BREACHES OF THIS POLICY

Any Nichols Personnel who breaches this policy may face [disciplinary action](#), which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with Business Partners and Third Parties and organisations working on our behalf, if they breach this policy or any modern slavery laws.

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ASKING QUESTIONS AND SEEKING GUIDANCE

If you have any questions in relation to this policy or require guidance on whether a proposed course of action may be in breach of it, please contact the Legal Director.

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