



## NELSONS' ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

### OUR BUSINESS

Nelsons is the UK's largest, and Europe's oldest, manufacturer of natural healthcare products. Our head office is located in Wimbledon, London. We have three subsidiary offices (Boston - USA, Hamburg - Germany, and Monaco); one retail pharmacy (Mayfair, London - UK); and two manufacturing sites (Wimbledon, UK and Snowdonia, UK). Both manufacturing sites are GMP (Good Manufacturing Practice) compliant and audited by the UK MHRA (Medicines and Healthcare products Regulatory Agency). Our Wimbledon manufacturing site additionally has FDA (US Food and Drug Administration) accreditation. We have distributor partnerships in all our key markets and have distribution in over sixty-five countries. We also supply to market through pharmacy and grocery retail channels, as well as to online marketplaces.

### OUR VISION AND MISSION

Nelsons has in place an existing corporate social responsibility framework; 'Happier & Healthier' Planet; Community; and People, which embraces our company's:

- **Mission** of inspiring generations to live healthier, happier lives;
- **Vision** of being a leading socially responsible natural healthcare group dedicated to our consumers' everyday health and wellness through high quality naturally inspired global brands that deliver effective results in a gentle and safe way for our consumers and everyone along the end to end supply chain; and
- **Core values** of passion, responsibility, integrity, excellence, and collaboration. Integrity is one of Nelsons' core values; we do everything we can to cultivate a culture of integrity throughout our business and its operations.

This statement outlines our ongoing commitment to acting ethically and responsibly in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking are not taking place anywhere, across any part of our global business or supply chain. This strong commitment is reflected in Nelsons' Anti-Slavery & Human Trafficking Policy, any breach of which is taken very seriously.

### OUR COMMITMENTS

We have zero tolerance to slavery and human trafficking, and a strong pledge towards ethical and responsible trading. We are 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 disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards



A Nelson & Co Limited Nelsons House 83 Parkside Wimbledon London SW19 5LP

t: +44 (0) 20 8780 4200 f: +44 (0) 20 8789 0141 enquiries@nelsons.net www.nelsons.net

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from all of our contractors, suppliers, distributors, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Nelsons has a long tradition of supporting communities both in the UK and abroad through its approach to fair and ethical business practices; ethical business conduct is a fundamental element of what makes Nelsons a company of which we are all proud. Our ongoing engagement with this critical area gives the Board confidence that day to day business decisions are always taken within the context of the appropriate mind-set, guided by our culture and core values. We expect to see these behaviours at all levels of the company. Maintaining our reputation as a responsible business depends on both our individual and collective conduct, and we place strong focus on the way we operate our business activities.

## HOW DO WE MITIGATE AGAINST ANTI-SLAVERY & HUMAN TRAFFICKING IN OUR SUPPLY CHAIN?

As part of our ongoing initiatives to identify and mitigate risks around anti-slavery and human trafficking in our supply chain, we have in place the below programmes, processes and policies. All of these act to:

- Identify and assess potential risk areas in our supply chain;
- Monitor potential risk areas in our supply chain; and
- Protect whistle blowers.

**Business Conduct Programme:** Every Nelsons' worker annually completes our online Business Conduct E-Module & Knowledge Check which covers the core areas of Modern Slavery, Anti-Bribery, Anti-Facilitation of Tax Evasion, Confidentiality, Conflicts of Interest and Whistleblowing. Each of these areas is underpinned by a Policy. 100% of the company successfully completed this programme in 2020 and there have been no dismissals for breaches of business conduct in 2020.

**Business Relationships:** Nelsons strive to work with customers and suppliers that embrace standards of ethical behaviour that are consistent with our own standards and policies. Many of our relationships are long-standing, due to the regulated environment within which we operate. We are committed to responsibly conducting business throughout our supply chain, and continually improving processes which reduce the risk of unethical practices. To clarify the standards of conduct we expect from our suppliers, we follow the below best practices to reinforce our stance on responsible procurement:

- **Due Diligence & Auditing:** Before commencing work with us, all suppliers must pass through our procurement, quality, and legal & compliance pre-contract due diligence, which includes insurance verifications, industry accreditation checks, disclosure of outstanding legal claims, and a physical audit of their premises. All of these ensure compliance with our standards across quality, technical, regulatory and business conduct disciplines.
- **Supplier Code of Conduct:** We are continuing to work with our suppliers on completion of

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PHARMACY

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our Ethical Sourcing Questionnaire which forms part of our Supplier Code of Conduct, to ensure our suppliers embrace the standards of behaviour we expect. Our Code and Questionnaire are based on 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.

- **Contracting:** We embrace fair negotiations with our suppliers and always strive to ensure parity and equity in our mutually agreed commercial and legal terms.

**OUR CONTINUED COMMITMENT**

We recognise the importance of maintaining constantly alert to identifying and addressing any issues in relation to slavery and human trafficking in Nelsons, and throughout our supply chain. We will undertake annual reviews of our approach to anti-slavery and human trafficking, to ensure our policies and programmes, driven by our Board and Executive Leadership Team, are embedded throughout Nelsons’ culture, structure, systems and processes.

**APPROVAL OF THIS STATEMENT**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our anti-slavery and human trafficking statement for the financial year ending 2020. This statement was approved on behalf of the Nelsons’ Board.

Signed:

Garry Watts  
Nelsons’ Chairman

Dated: 29/9/2021



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