

## **Our commitment to Ethical Trading**

# Transparency in supply chains

Neville UK PLC is a fast-growing, privately-owned PLC, supplying Professional Catering products to a large range of Catering Equipment Distributors. These consist of both National & Independent Distributors across the UK & Ireland and we are growing our export business rapidly. Our products are used extensively within the restaurant, bar, hotel and pub sector, covering both front of house products including cutlery, tableware and glassware, to back of house ranges of Cookware, Kitchenware and utensils covered include tableware, cutlery, cookware, kitchenware & chef clothing.

We take our ethical and legal obligations seriously and have incorporated the Modern Slavery Act and the requirements it places on business to tackle forced labour and human trafficking. Integrity is one of our core values and being open and honest with our suppliers and customers is a key part of this.

We value our relationships with all of our suppliers and understand we are only as good as the workforce producing our products. We are committed to working closely with our supply chain and together making the necessary improvements required.

### Due diligence

Our suppliers are required to meet the Nevilles Supplier Code of Conduct, which includes the provision that workers are free to choose their place of employment. Our Code of Conduct is aligned with the Ethical Trading Initiatives base code, founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

All suppliers have to sign our Code of Conduct and this forms part of the trading agreement with Nevilles, renewed annually.

Nevilles suppliers need to complete a Supplier Audit Questionnaire (SAQ), where, amongst other requests for information, they must declare details of their labour practices before they can start to supply to us. We are registered with Sedex and where we can, we work with our supply chain to have a valid membership. We monitor all suppliers through our Supplier Relationship Management system (SRM), where any sites which demonstrate a higher risk than acceptable are obliged to have an independent audit.

### **Risk assessment**

Nevilles is constantly learning and improving our understanding of the risks throughout our supply chain. We understand that Modern Slavery is a criminal activity, and audits only reveal a limited amount of information as the signs can be difficult to identify. We have integrated the way we manage issues raised through submitted SAQ's, adopting a scoring matrix which establishes a pass or fail assessment. For those suppliers who do not achieve a





satisfactory assessment score, a remediation period commences, where we enact a Corrective Action Reporting process to ensure that issues are resolved as quickly and effectively as possible.

# Awareness and collaboration

Our policies, including this statement, are available on our company internal intranet portal hub file and are accessible to all colleagues. We also post regular updates using this media platform.

Nevilles also has a cloud-based training hub called "Access" where we have specific training programmes for staff. This has the benefit of being able to validate who has completed the course(s) so we can ensure that all colleagues have attended training and have an awareness of issues in our international supply chains.

These training courses include mandatory compliance sections on Anti-Bribery and Mental Health Awareness. Staff also have access to our Employee Assistance Programme (EAP) with has vast amounts of additional training, covering Mental Health, seasonal health tips and advice through to financial assistance and help with family issues.

Additionally, our Marketing Manager pulls together the charity work undertaken by colleagues throughout the business, which includes/incorporates charities supporting issues found in our communities and in line with our Sustainable Development Goals (SDG's).

We need to understand our complex supply chains deeply and proactively. Collaborating with suppliers to improve traceability and transparency. With our internal metrics, Sustainability working group, SDG's and Sedex membership we strive to ensure supply chain compliance and help with that by collaborating closely with them to achieve a common goal.

### References

Our policies are designed to meet and exceed the UK Modern Slavery Act 2015 legislative requirements and are in accordance with the UN Guiding principles on Business and Human Rights and ILO.

Tristan Jones Operations Director April 2024