



**Nuclear Waste
Services**

Modern Slavery and Human Trafficking Annual Statement for Financial Year 2025-2026



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1. Our Modern Slavery & Human Trafficking Statement - Financial Year 2025-2026

This statement is made on behalf of Nuclear Waste Services (NWS) pursuant to Section 54(1) of the Modern Slavery Act 2015. The Act requires any organisation with a global turnover of £36 million or more, and operating in the United Kingdom, to produce an annual statement outlining the steps taken to prevent modern slavery and human trafficking in its operations and supply chains.

As an employer, NWS is also committed to upholding the principles of Equality, Diversity, and Inclusion. We strive to foster a respectful, inclusive, and non-discriminatory working environment where all employees feel safe and empowered to speak up about wrongdoing without fear of retaliation.

This statement describes the actions taken by Nuclear Waste Services during Financial Year 2025/26 to prevent modern slavery and human trafficking within our business and supply chain, the effectiveness of those actions, and the further improvements planned for Financial Year 2026/27.

- As NWS continues to map its supply chain, we remain committed to identifying and addressing potential risks related to modern slavery. We have expanded the methods by which we are alerted of potential Modern Slavery risks to include Resilinc War Rooms, Government Commercial Agency Market Reports, Supplier Reports and One Government Days and Artificial Intelligence data gathering.
- The NWS Commercial Directorate has fully launched our Intelligent Client process which encompasses strong and consistent compliance with modern slavery legislation. We have embedded modern slavery considerations within our major construction procurements through the application of our Intelligent Client Process.
- Modern slavery training is mandatory for all employees within the Commercial function. While not required for other areas, the training is available to those whose roles may involve relevant risks. This supports our commitment to raising awareness and promoting accountability across the organisation.
- We have launched a dedicated Speak Up page on our Intranet and are providing access to all relevant policies to our Supply Chain via our .gov website.
- We align our practices with the current National Procurement Policy Statement (NPPS) and the latest Procurement Policy Notes (PPNs) to ensure we meet, at a minimum, their expectations for identifying and mitigating modern slavery risks.

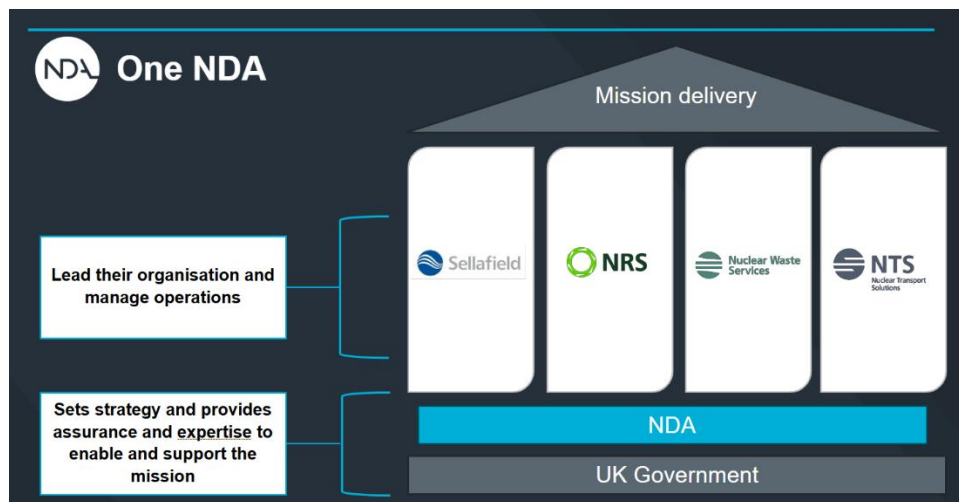
This statement is reviewed and approved by the NWS Board of Directors prior to publishing.

2. Our business

NWS (Company Registration No 5608448), registered office is at Pelham House, Pelham Drive, Calderbridge, Cumbria CA20 1DB.

We are part of the Nuclear Decommissioning Authority (NDA) group, which is undertaking one of the largest nuclear decommissioning and remediation programmes in Europe over many decades. NWS is integral to this environmental clean-up mission, as we work to provide safe, secure, and permanent solutions to the UK's nuclear legacy.

The image below provides an overview of how the NDA and its subsidiaries are connected:



NWS' purpose is to provide solutions that are vitally important to the UK today and for future generations. Using our facilities and expertise, NWS continues to safely manage radioactive waste already created over the past 70 years, supports the UK Government's net zero ambition by preparing to safely manage future radioactive waste. We do this via 3 Value Streams:

- Repository Site (Nuclear site license operator) – we are responsible for managing and operating sites, like the repository, that fall within the remit of Nuclear Waste Services. The focus is on the safe, compliant, and effective management of waste management infrastructure.
- Geological Disposal Facility (GDF) (Project developer) – we are managing the delivery of large-scale capital projects, with an initial focus on a GDF. This involves working with communities to find a suitable site and a willing community to host the GDF.
- Waste Solutions (Service provider) – we are working with customers to provide waste management services and solutions to address their challenges. As well as providing advice and expertise, we manage contracts and relationships across the waste cycle.

For more information about NWS please visit: [Nuclear Waste Services | Safe waste solutions for the UK](#)

3. Our supply chain

NWS is committed to developing a supply chain that supports the delivery of safe, sustainable nuclear waste solutions while delivering value for money for the UK taxpayer throughout the commercial lifecycle.

In Financial Year 2025/2026 we spent over £100m with circa 350 suppliers with 40 Suppliers making up 80% of that spend. Our supply chain partners include large multinational organisations, publicly owned bodies, universities, and a diverse range of small and medium-sized enterprises (SMEs). In alignment with the UK Government's SME agenda, we actively work to remove barriers and increase SME participation in our contracts wherever possible. Our direct SME spend in Financial Year 2025/26 was just under 13%.

Currently, our supply chain delivers a wide range of services, including site programmes and operations, waste management, and professional and business services.

4. Our policies and guides relating to modern slavery.

NWS operates the following policies and training in support of preventing modern slavery and human trafficking.

4.1 Modern Slavery and Human Trafficking Policy

NWS is committed to engaging with both internal and external stakeholders to raise awareness of the risks of modern slavery within our operations and supply chain. We actively promote the prevention, detection, and reporting of any suspected instances of modern slavery or human trafficking.

Our policy requires that clear and accessible channels are available for stakeholders to report concerns or activities that may indicate modern slavery. To support this, we have our Speak Up policy, which provides safe and confidential reporting mechanisms. This includes access to the Safecall service, a free, 24/7, independent reporting line that connects directly to the NDA Group Ethics and Compliance team.

4.2 Whistleblowing Policy

Our Modern Slavery Statement is also aligned with our Whistleblowing and Grievance Policies, which provide clear and accessible channels for staff and other stakeholders to raise concerns related to modern slavery. These policies ensure that individuals can report issues in a safe and supportive environment.

4.3 Code of conduct

Our commitment is further reinforced through our Code of Conduct, issued as part of the NWS Standards and Expectations Handbook. It clearly outlines our expectation that individuals report all observations and abnormal events, supporting a culture of transparency and accountability.

4.4 Modern Slavery Training

Modern Slavery awareness training, delivered through the Government Commercial College, is mandatory for all members of the NWS Commercial Directorate.

Financial Year	Commercial completed
2023-2024	86%
2024-2025	100%
2025-2026	100%

Figure 1- Modern Slavery Training Completion Rate

5. Due diligence processes

To fulfil the commitments made within our policies, NWS operates the following business processes.

5.1 External focus Pre-contract Procurement and Purchasing

NWS continues to use the Modern Slavery Assessment Tool (MSAT), as recommended under the Modern Slavery Act 2015, to assess and monitor compliance within our supply chains.

NWS adopts a risk-based approach to modern slavery due diligence. Procurement activities are assessed for inherent risk based on factors including the nature of the goods or services being procured, workforce characteristics, labour intensity, supply chain complexity and any other relevant risk indicators identified as part of the procurement process. Where elevated risks are identified, enhanced supplier assessment, due diligence and assurance activities are applied.

For contracts identified as medium or high risk for modern slavery, we require suppliers to complete a set of Supplier Audit Questions (SAQs). This self-assessment includes the submission of documented evidence to demonstrate compliance. These questions and associated processes are fully embedded within our Intelligent Client Process and associated Toolkit, and we remain committed to applying this approach as part of our ongoing due diligence.

Modern slavery and human trafficking risks are also considered when appointing new suppliers. Suppliers must demonstrate that they have appropriate policies and procedures in place, provide safe working conditions, treat workers with dignity and respect, and act ethically in their use of labour.

As part of our supplier onboarding process, we review the latest reports from external rating agencies, including Dun & Bradstreet. Any concerns or risks identified during this stage are escalated to senior management for further review and action, where appropriate.

5.2 Post-contract Delivery and Management

All commitments and requirements agreed at the procurement stage—including those related to modern slavery policies and procedures—must be upheld for the full duration of the contract. Contract Management leads are responsible for defining quality assurance requirements within the Contract Management Plan, which is used, reviewed, and updated as necessary throughout the contract lifecycle.

Where specified in the Contract Management Plan or required as part of risk mitigation, NWS may conduct site visits to supplier premises to assess working conditions and practices as part of mobilisation and assurance activities.

We monitor supplier financial risk, spend and performance on a quarterly basis and nominate suppliers for Supplier Assurance activities where deemed appropriate. Modern Slavery is considered and assessed as part of the assurance scope. Three supplier assurance reviews were completed during Financial Year 2025/26. No findings, observations or concerns relating to modern slavery or human trafficking were identified.

Any serious concerns, observed violations, investigations, or alleged offences related to slavery or human trafficking are reported through the NWS event reporting system and shared across the NDA Group to ensure appropriate visibility and action.

We also conduct horizon scanning of our suppliers to identify any emerging modern slavery concerns. As part of our ongoing monitoring of critical suppliers and our supply chain mapping, beginning with Tier 1, we have implemented Resilinc alerts. These alerts enable proactive monitoring of potential modern slavery risks, allowing us to identify and investigate areas of concern in a timely manner.

6. Key goals and key performance indicators (KPIs)

This year, a compliance check was conducted across our supply chain. We will continue to carry out these checks on an annual basis to monitor any changes in compliance and ensure ongoing alignment with our modern slavery commitments.

Financial Year	Suppliers representing 80% of spend	Suppliers qualified to publish a Modern Slavery Statement	Qualified Suppliers that have published a Modern Slavery Statement
2023-2024	24	12	100%
2024-2025	28	19	100%
2025-2026	31	18	100%

Figure 2- Top 80% Of Supplier Spend: Modern Slavery Statement Publication Check

7. Our effectiveness in combating slavery and human trafficking

The identification and assessment of risks or potential instances of modern slavery and human trafficking are currently integrated within our broader supply chain management framework. Through the assurance, monitoring and due diligence activities undertaken to date, NWS has identified no substantiated instances of modern slavery or human trafficking within its supply chain.

Financial Year	Incidents
2023-2024	0
2024-2025	0
2025-2026	0

Figure 3- Number Of Modern Slavery Incidents

8. Further Steps for Financial Year 2026/2027

We are aware of the updated Home Office guidance on transparency in supply chains and are currently considering how this can be reflected in our future modern slavery reporting. As part of this, we intend to work collaboratively over the next year to review the guidance and identify opportunities to strengthen next year's statement. This will include moving towards a single NDA Group Modern Slavery Statement. The review will consider how we undertake risk assessments, due diligence, supplier engagement, training, governance and alignment of measures of effectiveness in relation to modern slavery risks.

In addition to this, over the next 12 months, NWS will:

- Evaluate the appointment of a designated Modern Slavery Champion to provide visibility, oversight and coordination of modern slavery activities across NWS.
- Continue to embed modern slavery checks within procurement and supplier due diligence for higher-value activity
- Strengthen alignment with the wider oneNDA group to inspire shared learning, improve collaboration, and encourage consistency across Modern Slavery activities.
- Refine our statement so that it aligns with the oneNDA collaboration, incorporating Home Office guidance where appropriate
- Benchmark NWS arrangements against those adopted across government and the wider NDA Group to identify opportunities for further improvement.
- Further develop supply chain mapping activities, including the identification of critical suppliers and enhanced visibility of higher-risk areas beyond Tier 1 suppliers where proportionate and practical.



We remain confident that the actions NWS is taking are both effective and appropriate in meeting our commitment to preventing modern slavery and human trafficking within our business and supply chain.

Name	Role	Signature	Date
Steve Glasson	Commercial and Business Services Director		
Seth Kybird	Chief Executive Officer		
Liz Peace	Chair of the Board of Directors		