Modern Slavery Act Statement

1. Introduction

Section 54 of the Modern Slavery Act 2015 ("the Act") requires organisations with an annual turnover above £36 million to publish an annual slavery and human trafficking statement. NNL's annual turnover exceeds this threshold.

This statement outlines the actions taken by NNL during the financial year ending 31 March 2024 to ensure slavery and human trafficking is not taking place in any of NNL's business or supply chains. It also considers what further steps NNL can put in place to continually improve.

NNL is committed to preventing modern slavery and human trafficking. NNL will not tolerate the abuse of men, women or children and strives for total transparency right through its own business and supply chains. Accountability is assigned to the NNL Chief Financial Officer, with the Procurement Team undertaking day to day management.

2. NNL's Background

NNL is a wholly owned subsidiary of NNL Holdings Limited, which in turn is owned by the UK Government through UK Government Investments. NNL's sponsoring department in Government is the Department for Energy, Security and Net Zero. NNL is the only trading company within the group which meets the requirements of Section 54(1) of the Act.

As the UK's National Nuclear Laboratory, NNL offers a breadth of technical advice, solutions, products and services supporting the complete nuclear fuel cycle, from fuel manufacture and power generation to reprocessing, waste treatment and disposal. We operate from eight sites in Cumbria, Lancashire, Cheshire, Leicester, Gloucestershire, Oxfordshire and Wales, although most of our work is focused around our sites in the North West of England, and we are the second biggest industrial employer in West Cumbria.

NNL plays a central role in the co-ordination of UK nuclear research and development and maintains close links with academia and industry. We support Government in safeguarding the UK's nuclear skills and capabilities and provide advice on key strategic decisions.

3. NNL's Supply Chain

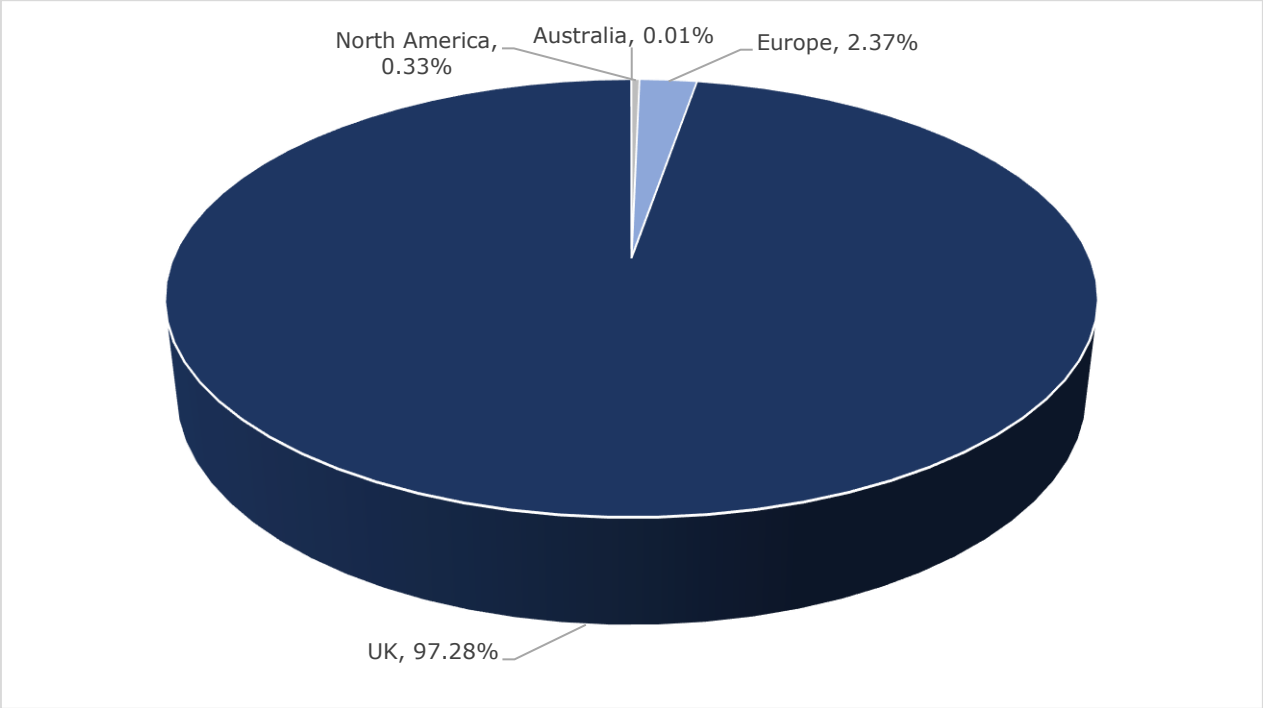
NNL will not engage in business with any supplier or individual known to engage in practices which are in breach of the Act and takes a zero-tolerance view to any suppliers who are found in breach of the Act after contract award.

NNL carries out due diligence during the tender supplier selection process, including use of the Government's Standard Selection Questionnaire ("SQ"), which requires suppliers to declare their compliance with the Act. We use data analytic resources, such as RapidRatings and Dun & Bradstreet to evaluate the financial stability of our suppliers.

NNL's terms and conditions require our suppliers, and each of their subcontractors, to comply with the Act and NNL has the right to terminate a contract if a supplier is subsequently found to be in breach of the Act or found to have misled NNL during the tendering process.

Consideration has been given to NNL's supply chain and due to the geographical nature of our suppliers (see chart) and the types of products/services procured, the risk is considered low.

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NNL's supply chain

NNL carries out periodic reviews of our suppliers (including utilising Government audited frameworks and suppliers), in particular where multi-year contracts are placed. This allows us to reassess any of the information, including suppliers' compliance with the Act, provided at the time of the contract award.

4. Policies

NNL has an Anti-Slavery and Human Trafficking Policy which has been endorsed by the NNL Executive Leadership Team and communicated to all employees and staff via NNL's Information Management System.

5. Training

Members of the Procurement team have completed the Chartered Institute of Procurement and Supply ("CIPS") Ethical Procurement and Supply eLearning and have performance objectives to secure chartership where applicable.

All staff have access to training and awareness of public procurement processes (including supplier due diligence) through NNL's e-learning platform, intranet, and Information Management System.

All staff have completed mandatory sustainability training.

6. Developments from NNL's Modern Slavery Act Statement FYE 31 March 2023

We are reviewing ways to more effectively use supplier due diligence tools and to check alignment with the SQ including around modern slavery.

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In addition, to the supplier assurance and periodic re-assurance activities set out in paragraph 3, supplier performance is tracked and fed back to the Executive Leadership Team each month.

7. Further Considerations

NNL is carrying out a review of our procurement terms and conditions, policies and procedures with a view to ensuring these reflect the Procurement Act 2023 and latest Government guidance (including verifying that our assurance activities mirror the Government's modern slavery assessment tool).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes NNL's slavery and human trafficking statement for the financial year ending 31 March 2024.

Matt Miller

Chief Financial Officer

National Nuclear Laboratory Limited

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