



Anti-Slavery and Human Trafficking Statement 2026

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Introduction

We, Diamond Light Source Limited, have a zero-tolerance approach to slavery and human trafficking, and continue to be committed to improving our practices to prevent modern slavery and human trafficking in our business and supply chain.

This statement highlights the key activities we have undertaken during our financial year (1 April 2025 to 31 March 2026) to combat modern slavery in our organisation and supply chain.

Our structure and business

We are a private limited company funded as a not-for-profit joint venture between the UK Government via the Science and Technology Facilities Council (as part of UK Research and Innovation) and the Wellcome Trust, a global charitable foundation. We have no subsidiary companies.

We are the United Kingdom's national synchrotron serving scientists and researchers from around the world. We provide academic and industry researchers access to facilities that enable world-changing science. Our synchrotron machine generates extremely bright light that is directed into laboratories known as beamlines.

Scientists use the light to find solutions to humanity's most critical challenges, from health, food security and biotechnology to energy, climate change and advanced materials. We are in the process of upgrading to a fourth-generation synchrotron, generating a brighter and more coherent light. This will provide enhanced imaging and analysis capabilities, helping the United Kingdom to remain at the forefront of scientific discovery.

We operate solely in the United Kingdom from Diamond House, Harwell Science and Innovation Campus, Didcot, Oxfordshire and employ over eight hundred scientists, engineers, technicians, and support staff.

Oversight and governance

Our Board of Directors has overall oversight and responsibility for our anti-slavery and human trafficking initiatives.

During this financial year (2025/2026), we established the Anti-Modern Slavery Working Group ("Working Group") to support our commitment to improving our practices to combat slavery and human trafficking and to facilitate our response to modern slavery by ensuring best practice and compliance with the legislative requirements of the Modern Slavery Act 2015 and associated statutory guidance.

The core members of the Working Group are from our Procurement, Human Resources, Legal, Finance, Soft Facilities Management and Communications departments. The Working Group meets at least three times a year with the aims of:

- ensuring compliance with the Modern Slavery Act 2015;
- identifying potential areas of risk within our operations and supply chains, re-assessing identified areas of risk and developing procedures to prevent such risks;
- gathering information, developing and overseeing our annual Modern Slavery Statement;
- raising awareness about modern slavery across Diamond;
- fostering open and constructive discussion on modern slavery and sharing knowledge, expertise and experience in relation to modern slavery risks across our business.

The Working Group is advisory only and escalates any matter requiring a decision to our Chief Financial Officer.

The Working Group reports to the Finance and Corporate Services Risk Committee outlining the activities of the Working Group and the developments to our Modern Slavery Statement. The Finance and Corporate Services Risk Committee reports to the Risk Coordination Committee, which has oversight of risk across Diamond and advises our Executive Directors and the Audit Finance and Risk Committee, a sub-committee of the Board of Directors, on our risk governance and management.

The Audit Finance and Risk recommend the annual Modern Slavery Statement to our Board of Directors for approval.

Our risk management

The newly established Working Group maintains a risk assessment identifying potential areas of risk within our operations and supply chains. The Working Group re-assesses identified areas of risk and considers if there are any new risks at each meeting and makes recommendations for new or enhanced mitigations if required.

Our employees

We have determined the risk of modern slavery in relation to our direct employees to be low.

Our Human Resources department ensures that:

- All employees have the legal right to work in the United Kingdom.
- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate their contract and leave their employment.
- We do not withhold any employee's identity documents (e.g. passport) during their employment.

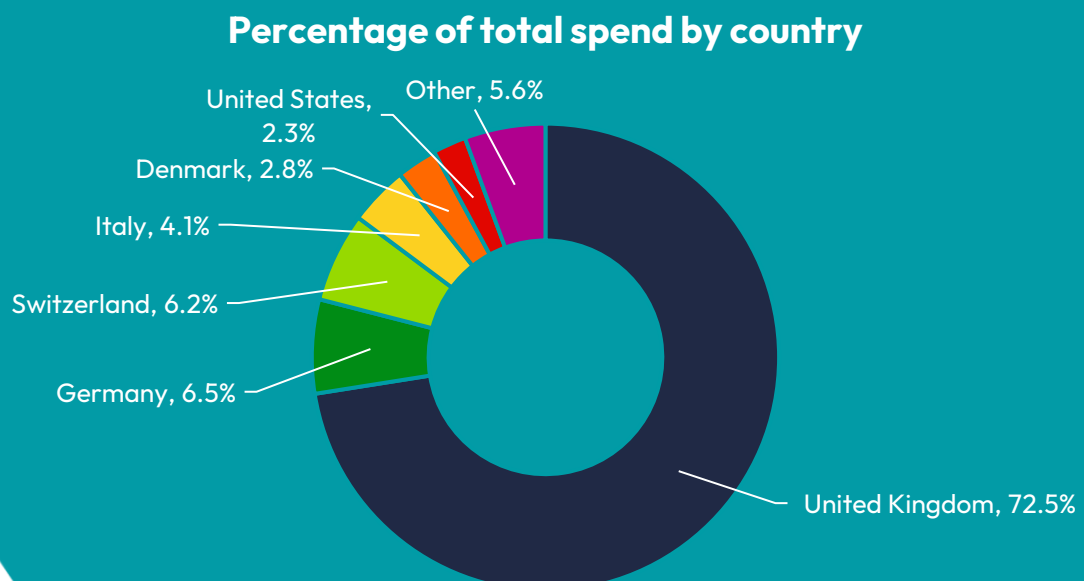
- All employees are paid at least the minimum wage.
- We comply with all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies and sickness, parental leave and minimum rest break periods.
- All employees can join a trade union of their choice and are supported in doing so. We have a collective agreement in place with Prospect.
- All employees have access to several different routes to raise, and report concerns as detailed in our Whistleblowing Policy. To strengthen our support in this area, during this financial year (2025/2026), we partnered with Health Assured, our Employee Assistance Programme provider, to extend their services to include their Speak Up provision. This provides our employees with a 24/7 confidential reporting mechanism that allows employees to raise concerns, with the option to remain anonymous.

Our supply chains

We recognise that it is crucial to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

Our supply chains comprise various third-party suppliers. The range of products and services procured from our suppliers include, but are not limited to, outside manufacturing services, scientific equipment, information technology hardware and software, cleaning and professional services.

Suppliers are geographically diverse with the majority of suppliers being located in the United Kingdom and Europe. The graph below shows the top six countries that we procured goods and services from based on spend for this financial year (2025-2026):



To help identify, monitor and mitigate the risk of slavery and human trafficking in our supply chain our Procurement department ensures that:

- Compliance with the Modern Slavery Act 2015 is included as a term of our supply contracts including our ability to terminate the contract immediately for any breach by the supplier or its subcontractors of modern slavery compliance.
- Regular assurances are sought that suppliers are taking steps to ensure there is no modern slavery, human trafficking and child labour in any part of their business and supply chains.
- Appropriate and proportionate due diligence, and enhanced due diligence where necessary, is undertaken to understand a supplier's position on modern slavery, human trafficking and child labour and whether they have sufficient controls in place. This includes requiring all of our suppliers to complete our online Modern Slavery and Human Trafficking Questionnaire. If the supplier is based in a high-risk country, we also undertake a sanction screening check against the supplier using third party software.
- Our suppliers abide by our Supplier Code of Conduct, which outlines our expectations around ensuring a fair and ethical workplace, where workers are treated with dignity and respect and the highest standards of human rights are upheld. Our Suppliers are sent our Supplier Code of Conduct with every order.

We classify suppliers as high-risk for modern slavery based on our spend and supplier location with reference to the Global Slavery Index and responses to our Modern Slavery and Human Trafficking Questionnaire.

We consider that our highest risk is the procurement of computing hardware. This is because the manufacture of equipment may occur in several locations with minimal regulation and oversight of labour practices. To reduce this specific risk, and other risks in procuring goods and services, we are a full member of the London Universities Procurement Consortium ("LUPC"), which provides us with the benefit of collaborative procurement, including access to all LUPC framework agreements which are tendered in compliance with public contracts regulations, helping members ensure their procurement activities meet legal requirements and reduce the risk of non-compliance. As part of our membership of LUPC, we also obtain affiliation with Electronics Watch, which helps mitigate our identified risk in procuring computing hardware. Electronics Watch is an independent monitoring organisation that helps public sector buyers work together to protect human labour rights, improve working conditions and understand risk and violations in the global electronics supply chains. Affiliation also includes access to Electronics Watch clauses, resources, and direct support.

Our policies

We aim to have appropriate policies in place that underpin our commitment to eliminate modern slavery and human trafficking in our business and supply chains. All of our policies are governed by a Policy Framework which describes the development, approval, review and management of policies. This Framework also governs how we communicate and enforce our policies.

Our Anti-Slavery & Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We developed the Policy in conjunction with our Legal, HR and Procurement teams and the Policy is reviewed every two years; the review being led by our Legal team.

The Anti-Slavery & Human Trafficking Policy is communicated to our staff on our intranet and to suppliers via our website. Any member of staff who breaches the Policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Compliance with the Policy is included as a term in our contract with our suppliers. We may terminate our relationship with a supplier if they breach our policy.

Our Anti-Slavery & Human Trafficking Policy is supported by our Supplier Code of Conduct, compliance with which is included as a term in our contract with our suppliers. The Code of Conduct outlines the basic ethical requirements that suppliers should adhere to in order to do business with Diamond. By contracting with us, the supplier is confirming that it complies with the provisions outlined in the Code. Suppliers are expected to be transparent in their practices and actively promote adherence to our policies and processes. Our Procurement team regularly monitor suppliers through our supplier governance framework, including the use of questionnaires and audits, to identify and assess potential risks. We reserve the right to refuse to work with suppliers that do not achieve or are unable to demonstrate progress towards meeting our Code.

Our Anti-Slavery & Human Trafficking Policy is also supported by our Whistleblowing Policy and external Speak-Up Service.

Staff training and awareness

We require staff who are at higher risk of exposure to slavery and human trafficking (such as our Procurement team) to undertake training on modern slavery on induction and thereafter every two years.

This mandatory training was developed in conjunction with an external training provider and takes the form of an online video covering two sections ('modern slavery spectrum' and 'you and your organisation') and an understanding test. The

training raises awareness of the types of modern slavery, the key signs to look out for, and how to prevent, tackle and report modern slavery.

For this financial year (2025/2026), 100% completed the training with a pass rate of 100%.

Continuous improvement

To continuously improve our efforts to prevent modern slavery and human trafficking in our business and supply chain, during this financial year (2025/2026) we undertook the following initiatives and actions:

- Reviewed the contractual clauses relating to modern slavery in our procurement terms and conditions and updated where required as a result of changes in law and/or good practice.
- Established and commenced activities of the Anti-Modern Slavery Working Group.
- Partnered with Health Assured, to extend their services to include their Speak Up provision.
- Licensed a risk management platform, which will be rolled out across Diamond in financial year 2026-2027 and will include the risk of non-compliance with the Modern Slavery Act 2015.

Assessing the effectiveness of our actions for financial year 2025/26

Key performance indicators are presented below to demonstrate our commitment to transparency and managing the risks of modern slavery for this financial year (2025/2026):

- HR: percentage of employees confirmed as right to work in the UK: 100%.
- Supply chain: percentage of suppliers who have completed the supplier modern slavery questionnaire: 49%.
- Training: percentage of mandated employees completing and passing the mandatory training: 100%.
- Whistleblowing: number of reports raised involving concerns around human rights and modern slavery: 0.
- Contracts: percentage of contracts with modern slavery clauses legally obliging our suppliers to comply with modern slavery legislation: 100%.

Further steps planned for financial year 2026/27

During the course of our next financial year (2026/2027), we intend to undertake the following further steps to combat slavery and human trafficking in our business and supply chain:

- Review our supplier onboarding process including reviewing our:
 - Anti-Slavery and Human-Trafficking Policy;

- Modern Slavery and Human Trafficking Questionnaire;
- Supplier Code of Conduct.
- Improve the number of our suppliers completing our Modern Slavery and Human Trafficking Questionnaire.
- Roll out our online Modern Slavery and Human Trafficking Training to all employees.
- Continue to enhance our Modern Slavery Statement taking account of the Home Office's statutory guidance on Transparency in Supply Chains.
- Consider new ways to communicate and raise awareness to our staff about modern slavery.
- Deploy our new risk management platform.

Board of Directors approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31 March 2026.

It was approved by Diamond's Board of Directors on 1 July 2026.

Signed by: Prof Gianluigi Botton, Chief Executive Officer, Diamond Light Source Ltd

Date: 04 August 2026

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