

Nuclear Transport Solutions Modern Slavery Act Statement

This statement covers the period 1 April 2023 to 31 March 2024.



Introduction

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a slavery and human trafficking statement disclosing what steps are being taken to ensure modern slavery is not taking place in any of its business or supply chains.

Nuclear Transport Solutions consisting of International Nuclear Services Limited, Direct Rail Services Limited, and Pacific Nuclear Transport Limited is committed to ensuring that there is no modern slavery or human trafficking in any part of its business or supply chain.

This statement sets out its position on modern slavery, how it is addressing its risk and its objectives for the next financial year.

Who are we?

Nuclear Transport Solutions (NTS) is a trading name of Direct Rail Services & International Nuclear Services which are both wholly owned subsidiaries of the Nuclear Decommissioning Authority (NDA), a public body responsible for ensuring the safe and efficient clean-up of the UK's nuclear legacy.

We are specialists in the operational, commercial, engineering, legal and regulatory expertise that underpin nuclear transport and logistics operations, with decades of experience of providing safe, secure and reliable transport solutions.

We also work for customers outside the nuclear sector. For example, we operate a number of intermodal rail freight services in consumer goods and general freight markets. Undertaking this work ensures our capabilities and assets are maintained and enhanced and generates additional revenue to support the NDA's mission.

Operating in the UK and overseas, we employ circa 700 employees across three business lines: Rail, Shipping and Solutions.

Rail - Our rail business line continues to grow our reputation as a leading UK rail operator, with our people and assets providing specialist nuclear rail solutions, as well as intermodal and rail freight services for a range of non-nuclear customers under the DRS brand.

Shipping - Responsible for maintaining and enhancing our global reputation for safe and secure nuclear shipments. We remain the world's leading Category 1 shipper, whilst continuing to expand into other markets.

Solutions - The solutions business line provides a range of integrated solutions and specialist advice to the NDA and our customers in the UK and overseas – from feasibility studies and consultancy through to project delivery and contract management. Solutions is also home to our highly successful package design and licensing capability.

For more information about NTS please visit: www.nucleartransportsolutions.com.

UK and overseas operations



Our suppliers

We have a vast global supply chain, spending £105.5 million with 625 suppliers during Financial Year 2023/2024. This number reflects a range of suppliers, from one-off small value orders to longer existing contracts and collaborative frameworks.

Our largest expenditure is in the transport and logistics sector, predominantly through leasing our rolling stock, the management and operation of our fleet of ships and logistics.

Under the terms of their contracts, we require all Tier 1 suppliers to:

- Comply with all applicable anti-slavery and human trafficking laws, statutes and regulations and codes from time to time in force including the Modern Slavery Act 2015.
- Have and maintain their own policies and procedures to ensure compliance.
- Not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the United Kingdom; and
- Include in its Sub-Contracts with its Sub-Contractors and suppliers, a minimum level of anti-slavery and human trafficking provisions.

Our policy and procedures

NTS recognises the need to operate our business with effective policies and procedures. NTS has a number of relevant policies including:

- Anti-Modern Slavery Code of Conduct
- Speak Up Policy
- Anti-Modern Slavery and Human Trafficking Policy

We have issued an Anti-Modern Slavery and Human Trafficking Code of Conduct to increase staff awareness of modern slavery on our Intranet.

Addressing our risk

Our activities to combat slavery and trafficking are risk-based and correspond to the level of risk identified; we believe that this approach is proportionate and appropriate, we use an internal assessment tool to determine the level of risk for contracts over £25k, assessing:

- The industry type.
- Nature of work.
- Supplier location.
- Context in which the supplier operates.
- Commodity type, and
- Supply chain business model

We apply risk factor scores to determine, for each contract, the level of risk. The risk levels of the suppliers are categorised into four levels: No risk Identified, low risk, medium and high risk.

We have not yet started to assess our supply chain below Tier 1 or undertaken supply chain mapping, this will be an objective in future years.

During the last financial year, we have not been notified of or identified any evidence of Modern-Day Slavery occurring within NTS or our supply chain.

Employee involvement and training

Staff have access, through our training portal to Modern Slavery Courses.

Individuals within our Commercial Directorate are required to undertake an annual online Modern Slavery course, which includes a test upon completion. The course covers key topics such as an introduction to Modern Slavery and the Modern Slavery spectrum. Participants learn to identify signs and responsibly report instances of Modern Slavery.

An Anti-Modern Slavery and Human Trafficking Code of Conduct has been developed for Nuclear Transport Solutions and is available on our internal intranet.

NTS recognises and respects our employees right to join a Trade Union.

What have we done so far to address Modern Slavery and Human Trafficking?

- Appointed a Modern Slavery Champion.
- Produced an annual Modern Slavery and Human Trafficking Statement.
- Developed a Modern Slavery Code of Conduct for all staff.
- Undertaken a high-level risk assessment of our INS and DRS Tier 1 Suppliers who hold contracts with us over £25K using a segmentation tool.
- Undertaken a deep dive review of the NTS shipping supply chain and shared the review findings with the ship manager to highlight any high-risk suppliers.
- Conducted adverse media screening checks on suppliers within the NTS shipping supply chain identified as high-level risk, using a web-based third-party screening tool. The screening encompassed various media sources, giving particular attention to social media, to ensure that these organisations have a clean record, free from any convictions related to modern slavery offences.
- Continued to work with the NDA and the wider NDA Group to benefit from and share experiences.
- Reviewed our standard contract conditions to help ensure that the supply chain is clear about NTS's expectations in this area.
- Included, where appropriate, a mandatory pass/fail tender question in our tender pack.
- Used the Ethical Trading Initiative (ETI) Framework to assess our approach to Modern Slavery and Human Trafficking and to allow us to drive improvement in the quality of our statement over time.
- Refreshed our commercial staff (including all new members of our procurement team) training on identifying Modern Slavery in a supply chain.
- Created a section about Modern Slavery for all staff on our commercial intranet page including a guidance note on compliance with the requirements of the Modern Slavery Act.
- Undertaken a benchmarking exercise to assess our company's efforts in comparison to other companies within the transport industry. This has helped identify areas for improvement.

Objectives for 2024/25

- **Risk Assessment and Mitigation:** Conduct a comprehensive review of our risk assessment bowtie to identify potential causes and consequences of modern slavery risk, and to determine appropriate controls.
- **Cross-Functional Collaboration:** Promote collaboration between different departments within the organisation, such as legal, human resources, procurement, and sustainability, to ensure a holistic approach to addressing modern slavery risks and implementing solutions. Through the creation of Modern Slavery champions in each respective department encourage cross department collaboration.
- **Continuous Improvement in Due Diligence:** Continuously refine and revisit due diligence processes to adapt to evolving risks and challenges related to modern slavery. This will include a review of supplier evaluations for high value tenders. The use of discretionary exclusion will apply to suppliers if any modern slavery, trafficking, or human rights order is made against the supplier or connected person as per the new procurement act.
- **Expertise:** Invite experts or representatives from organisations specialising in combating modern slavery, human rights, or related topics. NTS will aim to choose speakers who can provide firsthand knowledge and real-world examples to make the issue tangible.
- **Supplier Performance Monitoring:** Develop and agree action plans to address the deep dive review findings of the NTS shipping supply chain. Communicate the action plans with the supplier to continuously monitor and enhance supplier performance.
- **Awareness:** Educate the wider business, via an updated communications piece on the importance of driving demand for ethical products and services. This will remind employees of the companies' objectives and signpost to wider readings on the topic and encourage them to suggest improvements to the policy.
- **Education:** Following introduction of mandatory training to the commercial directorate we plan to roll out mandatory Modern Slavery training across the wider business. Training will be completed on an annual basis by all staff.

Following a review of our supplier expenditures during the financial year that concluded on March 31, 2024, this statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes NTS's slavery and human trafficking statement for the year 2024/25.

It was approved in September 2024 by the NTS Board of Directors who review the statement annually.



Chief Operating Officer
for Nuclear Transport Solutions Date: September 2024