

Nuclear Transport Solutions Modern Slavery Act Statement

This statement covers the period 1 April 2024 to 31 March 2025.



Nuclear Transport Solutions (NTS) is a joint trading name of International Nuclear Services Ltd (Company Registration No. 1144352) and Direct Rail Services Ltd (Company Registration No. 03020822), whose registered office is Herdus House, Westlakes Science & Technology Park, Moor Road, Chesham, Bucks HP8 4HT.

Introduction

Section 54 of the UK Modern Slavery Act (2015) requires domestic and international 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 addresses its risk, including that within both our UK-based and international supply chains, and its objectives for the next financial year

Who are we?

Nuclear Transport Solutions (NTS) is a trading name of Direct Rail Services and 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 - Our shipping business line is responsible for maintaining and enhancing our global reputation for safe and secure nuclear shipments. We operate PNTL, the world's most experienced shipper of nuclear materials, and continue to expand into new markets.

Solutions - Our solutions business line is the gateway to NTS's transport and logistics capabilities. From consultancy and complex assessments to package design and licensing, we support nuclear transport and logistics projects from beginning to end and anywhere in between.

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

UK and overseas operations



Our suppliers

We have a vast global supply chain, spending £103.5 million with 585 suppliers during Financial Year 2024/2025. 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.

We expect our suppliers to have and maintain their own policies and procedures to ensure compliance with all applicable human rights and employment laws. 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; and
- 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;
- Not use nor allow its subcontractors to use modern slavery, child labour or inhumane treatment.

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

Our policies are easily accessible on the company intranet, and our current Modern Slavery Statement, as well as previous statements, are published on our company website for full transparency.

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 have used 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.

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 complete an annual online Modern Slavery training course. As of 2025, this mandatory training has been rolled out across the wider business. All staff will now complete the course annually, which covers key topics including an introduction to Modern Slavery, the Modern Slavery spectrum, and how to identify and responsibly report potential instances.

An Anti-Modern Slavery and Human Trafficking Code of Conduct has been developed for Nuclear Transport Solutions, to increase staff awareness, 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?

In 2023/24 or prior:

- 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.

In 2024/25:

- Conducted a comprehensive review of our risk assessment bowtie to identify potential causes and consequences of modern slavery risk, and to determine appropriate controls.
- Promoted collaboration between different departments within the organisation, to ensure a holistic approach to addressing modern slavery risks and implementing solutions. This was achieved through the appointment of Modern Slavery champions within various functions including Human Resources and our Legal department.

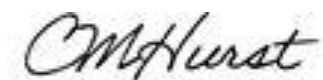
- Following the change to the new Procurement Act 2023, NTS continues to include Modern Slavery Checks within our due diligence processes when reviewing supplier evaluations for high value tenders.
- We have invited representatives from a charity organisation, Hope for Justice, specialising in combating modern slavery to speak and provide firsthand knowledge and real-world examples to make the issue tangible.
- Continue to produce communication pieces on the importance of driving demand for ethical products and services. This reminds employees of the company's objectives and signpost to wider readings on the topic and encourages them to suggest improvements to our policy.
- Following introduction of mandatory training to the commercial directorate we have now rolled out mandatory Modern Slavery training across the wider business. Training will be completed on an annual basis by all staff.
- Continue collaborating with our core supplier in the NTS shipping supply chain to promote transparency, encourage information sharing with their own suppliers, and actively monitor progress.

Objectives for 2025/26

- **Establish Bi-Annual Champion Calls** - Set up twice-yearly calls with Modern Slavery Champions and draft a standing agenda.
- **Risk Bow Tie Review** - Conduct another review of our Modern Slavery risk bow tie with input from our newly appointed Champions.
- **Review Internal Policy** - A formal review of our internal Modern Slavery Policy is scheduled in line with our three-year review cycle. The last review was completed on 17 October 2023, with the next review due by 16 October 2026 to ensure the policy remains current, compliant, and reflective of evolving risks and best practices.

Following a review of our supplier expenditures during the financial year that concluded on March 31, 2025, 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 2025/26.

It was approved in September 2025 by the NTS Board of Directors who review the statement annually.



Chief Executive Officer

for Nuclear Transport Solutions Date: September 2025