

NSG

legacy management

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

NSG Environmental Ltd is committed to preventing modern slavery and human trafficking in our business and in our supply chain, and to continuously improving our practices to combat such acts. NSG is committed to corporate governance and acknowledge that lawful and ethical behaviour is of paramount importance and critical to NSG's continued success. The NSG 'Standards and Expectations' require all NSG employees to operate with integrity and transparency in all interactions with clients and all other stakeholders.

NSG is fully supportive of the laws introduced within the United Kingdom through the Modern Slavery Act 2015 to combat slavery, forced or compulsory labour, and the trafficking of persons for any purpose.

ORGANISATION AND SUPPLY CHAIN

NSG Environmental Ltd is a part of the NIS Group of Companies, and our ultimate parent company is NIS Holdings Ltd. NIS Holdings Ltd's head office is in the United Kingdom. The Group has over 250 employees in the UK and a global annual turnover of over £36m.

NSG has been delivering work programmes in the nuclear industry for over 39 years. NSG's core skills include the management of engineering and site-based programmes delivering installation, refurbishment and upgrade services on operational systems, and waste management and decommissioning capabilities. NSG provides a diverse service to a broad customer base, offering integrated lifecycle nuclear waste management and site-based decommissioning solutions in the UK.

Due to the nature of the projects NSG undertakes, we work with a relatively large supply chain. The supply chain can be divided into three main areas:

- Material suppliers (e.g., builders merchants, hand and small tools, health physics (HP) and HP instrumentation, PPE, signage, workshop consumables, raw materials, chemicals and aggregates, scientific and laboratory stationery, etc.)
- Services (e.g., crane and lifting equipment, IT and communications technologies, logistics and transport, maintenance, repairs and facilities management, marketing services, media and advertising, etc.)
- Subcontract (e.g., professional services and consultancy, construction demolition and decommissioning, fabrication and metalwork, mechanical and engineering, waste management, etc.)

OUR POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

NSG Environmental Ltd is committed to preventing modern slavery or human trafficking in our business and supply chain. This commitment is supported by the following policies, processes and documents:

- Anti-Bribery and Corruption: NSG's Anti-Bribery and Corruption Policy reinforces our commitment to maintaining lawful business practices, and highlights NSG's zero-tolerance policy towards bribery & corruption and our commitment to acting fairly and with integrity in all business relationships
- Whistleblowing Policy: NSG's Whistleblowing Policy encourages anyone to raise any concerns relating to unlawful business practices, without fear of any repercussions
- Supplier Code of Conduct: NSG's Supplier Code of Conduct details how we expect our suppliers to behave, in line with our values and all legal requirements
- Procurement processes for assessment of suppliers: NSG has a rigorous assessment process, which covers equal opportunities, diversity and inclusion, as well as business and professional standing which requires compliance to the Human Rights Commission and Modern Slavery Act and agreement to abide by our Supplier Code of Conduct.
- NSG's company values and our 'Standards and Expectations' document reflect our commitment to acting ethically and with integrity at all times, and in all business relationships.

NSG Environmental Ltd

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DUE DILIGENCE

As part of NSG Environmental Ltd's commitment to identify and mitigate risk within the supply chain, we employ a dedicated Procurement team to manage the relationships with key suppliers. All suppliers are evaluated through questionnaires and evidence gathering before being added to NSG's supply chain, ensuring that suppliers with similar standards and behaviours to our own are utilised. As part of our procurement processes, we:

- Ensure NSG's suppliers with a turnover of above £36,000,000 have a modern slavery and human trafficking statement on their website
- Educate smaller suppliers in high-risk areas on their responsibilities to prevent modern slavery where applicable
- Utilise the systems we have in place, within the business and across our supply chain, to:
 - Identify, assess and monitor potential risk areas
 - Mitigate the risk of slavery and human trafficking occurring
 - Protect whistle blowers

RISK ASSESSMENT AND MANAGEMENT

The two highest risk areas for modern slavery and human trafficking occurring within our supply chain are through our smaller suppliers, i.e. those who do not have their own modern slavery policies and / or modern slavery statement in place, and through overseas suppliers. We continuously monitor our supply chain, both when we are onboarding and prior to placing contracts with them by utilising the procurement processes we have in place.

Additionally, we ask our suppliers to sign up to our "Supplier Code of Conduct", which contains a statement that "the supplier shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015 in any part of its supply chain. This includes, but is not limited to, not supporting or engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour and prison labour."

We are also able to provide training to our suppliers on modern slavery and human trafficking if this is required.

EFFECTIVENESS

To date, NSG's practices have successfully prevented modern slavery and human trafficking within or business and that of our supply chain. However, we are committed to continuously improving our processes and complying with all applicable laws and regulations, and as such will continue to develop our policies and processes in relation to modern slavery and human trafficking as required.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the business and supply chain, NSG Environmental Ltd requires all employees to complete a mandatory "Anti-Slavery" training module via our Learning Management System.

KEY ACTIVITIES UNDERTAKEN THROUGHOUT THIS REPORTING PERIOD

Throughout the 2023-2024 reporting period NSG Environmental Ltd has taken the following steps to improve our ability to combat slavery and human trafficking:

- Developed a "Supplier Code of Conduct" and have incorporated a requirement for suppliers to agree to abide by this code of conduct during our supplier evaluation process
- Increased anti-slavery training across the business – it is now mandatory for all employees to undertake an anti-slavery training module

FURTHER STEPS

Following a review of the effectiveness of the steps undertaken during the financial year ending March 2024, to prevent slavery or human trafficking in our business and in our supply chain, NSG Environmental Ltd intends to take the following steps to combat slavery and human trafficking:

- Continue to evaluate ways to heighten awareness of modern slavery concerns
- Continue to examine and improve our processes to identify, prevent and address the risk of modern slavery in the supply chains
- Continuously develop KPIs to ensure that the actions being taken are robust and protect both our business and any persons who could be impacted by modern slavery and human trafficking relating to our business.

*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 2024**.*



Jim Porter, Managing Director








Modern Slavery Statement 2024-25 (NSG) Jan update FINAL

Final Audit Report

2025-01-30

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