





## Introduction

The Modern Slavery Act 2015 ("the Act") requires organisations with a global turnover above £36 million to publish an annual 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.

At INS, we are committed to preventing modern slavery and human trafficking in any part of our business or supply chain. It is absolutely the right thing to do and we aim to take sustained and concerted action against such acts.

This statement sets out our position on modern slavery, our understanding of the risks and implications, and the steps that we are taking to mitigate the risks and ensure that slavery and human trafficking do not exist within INS or within our supply chains.

## INS and our supply chain

We are a wholly owned subsidiary of the Nuclear Decommissioning Authority ("The NDA"). The NDA was created through the Energy Act 2004 and is an Executive Non-Departmental Public Body reporting to the Department for Business Energy and Industry Strategy. We directly employ around 140 people in our UK offices and operate two wholly-owned subsidiaries, INS France and INS Japan. We also own a 68.75% share of Pacific Nuclear Transport Limited (PNTL), other shareholders being Orano (12.5%) and a consortium of Japanese nuclear utilities (18.75%). PNTL carries out the maritime transport of nuclear cargoes and has a fleet of ships managed by Serco Limited (for more information please access the PNTL website on [www.pntl.co.uk](http://www.pntl.co.uk)).

Our business relates to nuclear material transportation and related services. We contract with the supply chain for the goods and services needed to deliver our business objectives. For more information please access the INS website on [www.innuserv.com](http://www.innuserv.com)

Our subsidiaries do not meet the turnover threshold to publish separate annual statements under the Act and are included within this statement.

## INS direct suppliers

As part of our initiative to identify risk, we have undertaken a high level but risk-focused due diligence on our direct suppliers, giving consideration to the geographical nature of the suppliers and the type of product supplied.

Whilst we recognise that slavery can exist in any supply chain we are content that our suppliers work, in the main, in very low risk areas. Many of our routine purchases of consumable goods are made through Crown Commercial Services Framework Contracts and government-procured supply chains. Our procurement activities take place in England and our contractors and suppliers are predominantly UK and EU-based.

Our employees occasionally stay in UK or overseas hotels when conducting business away from the office. Accommodation and travel arrangements are organised through a government-procured travel agent with a publicly-stated risk-assessed supply chain procedure.

Our activities to combat slavery and trafficking are risk-based and correspond to the level of risk identified. Given our business model, we believe this approach to be proportionate and appropriate. We expect our suppliers to adhere to our same high standards.

## Supplier adherence to our values

To ensure all those in our supply chain and contractors similarly comply with our values we have signed up to the NDA Supply Chain Charter, which can be found on our website. This reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing appropriate and effective systems and controls. The Supply Chain Charter includes compliance with the Modern Slavery Act 2015.

## Steps currently taken

Accountability continues to be assigned to INS's Finance Director with a cross-functional team including assurance, procurement, legal and supply chain experts undertaking day-to-day management.

Before colleagues start working with us, we use pre-employment checks to confirm their identity and right to work in the UK. Information is provided to all employees on their statutory rights by virtue of their employment. Where recruitment agencies are used, we ensure they comply with all legal requirements. These procedures collectively help to address our ongoing commitment to eliminate all forms of forced and compulsory labour.



We have well-developed existing checks and balances within our business in relation to procurement and due diligence and we use industry-standard resources to help identify potential areas of forced labour or human trafficking in our supply base.

We have identified our main risk areas and have commenced a programme of additional due diligence in those areas.

We have inserted clauses into our standard terms and conditions requiring suppliers to comply with the anti-slavery legislation and we expect our supply chain to do the same.

Our tender documentation includes the mandatory exclusion (subject to self-cleaning provisions) of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

We continue to be part of the NDA's Supply Chain Charter, which has been revised to emphasise modern slavery issues and we have published this on our website.

We have ensured our approach follows emerging best practice by assessing and interpreting recent and emerging case law. We have benchmarked the activities we have undertaken against similar public and private organisations and have acted on the lessons learned.

We have carried out specific training for key managers within NDA and will continue to do so.

Policies supporting our approach to modern slavery include our Supply Chain Charter, our Procurement Policies and our Whistleblowing Policy – which is published on our intranet.

If there are any concerns relating to modern slavery or human trafficking they can be raised in confidence and without fear in accordance with our whistleblowing procedure.

We also have a confidential and independent reporting helpline operated by an independent company, Safecall, which specialises in handling concerns at work. Once a complaint has been made to Safecall, it will be forwarded to a high level official within INS who will decide how it is to be investigated. Any concerns will be fully investigated.

As of the date of this statement no instance of slavery or human trafficking has been identified.



## Next steps

This year we intend to take the following further steps:

1. Develop a Code of Conduct which will include additional information on our approach to modern slavery and distribute this to all employees.
2. Develop a modern slavery policy and confirm compliance with it via our annual assertion statement to the NDA.
3. Continue to develop and implement our risk-based approach to supplier audits, including understanding further our supply chains and the sub-contractors within those supply chains to enhance our understanding of the risks we face and enable us to develop effective measures to respond to those risks.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes INS's slavery and human trafficking statement for the financial year ending 31 March 2018.

A handwritten signature in black ink, appearing to read 'A Greaves', with a long horizontal stroke extending to the right.

**ALAINE GREAVES**  
Finance Director  
For International Nuclear Services Ltd  
Date: 25 September 2018

