

International Nuclear Services LTD Modern Slavery Act Statement 2020/2021



Introduction

The Modern Slavery Act 2015 is an Act of Parliament of the UK. It is designed to combat Modern Slavery in the UK.

INS is in full support of the act and recognises that INS and its extended supply chain have an important role to play in tackling these crimes.

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain. This statement sets out our position on modern day slavery, how we are currently addressing our risk and our objectives for the next financial year.

Who are we?

INS is a wholly owned subsidiary of the Nuclear Decommissioning Authority (NDA), which is an executive non-departmental public body sponsored by the Department of Business Energy and Industry Strategy (BEIS). Its business relates to irradiated fuel management and nuclear material transportation.

INS operates two 100% owned subsidiaries, INS France and INS Japan. It also owns 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 carry out the maritime transport of nuclear cargoes.

Our subsidiaries do not meet the turnover threshold to publish separate annual

statements under the Act and are included within this INS statement.

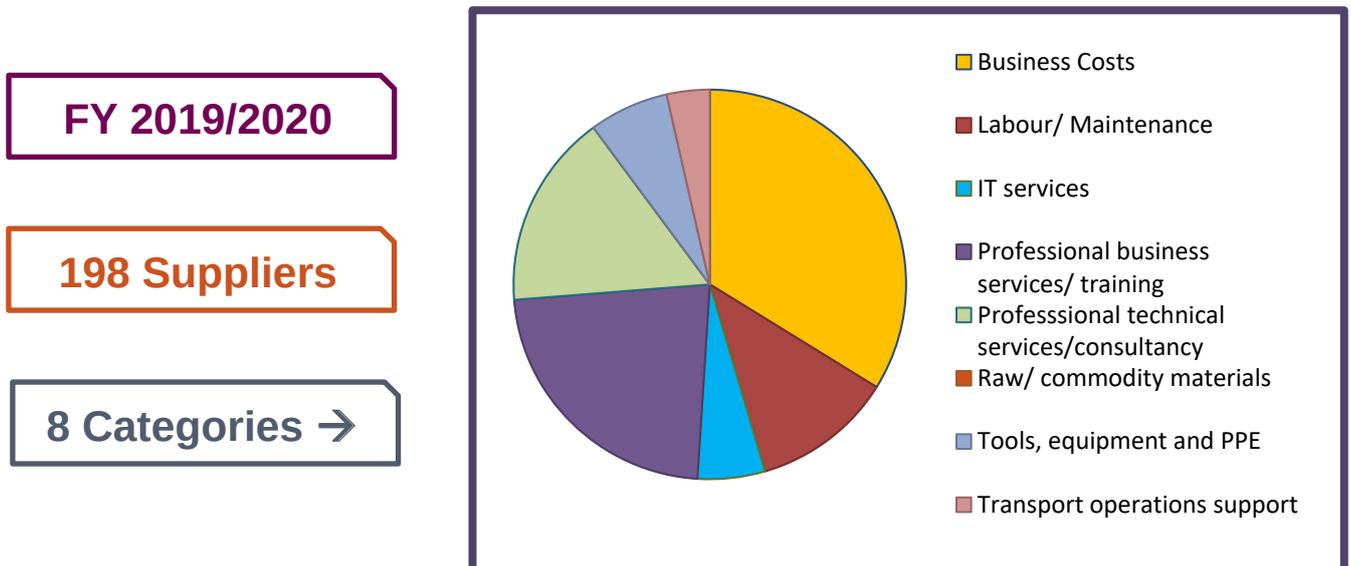
For more information about INS or PNTL please access the INS and PNTL website on www.innuserv.com and www.pntl.co.uk.



Our Suppliers

A big part of our work is in support of NDA’s strategy. This involves the transportation of spent fuels and the return of waste to countries of origin. We operate Pacific Nuclear Transport Limited (PNTL); the world’s most experienced nuclear shipping company who have a fleet of three INF3 nuclear transport carriers. INS contracts with the supply chain for the goods and services it needs to complete these shipments and other business objectives.

During Financial Year 2019/2020, INS has used 198 suppliers. This number reflects a range of suppliers, from one-off small value orders to longer existing contracts and collaborative frameworks.



Addressing our Risk

INS continues to develop its understanding of the risks in this area and will address new risks as they emerge. During the last financial year, INS has not identified any evidence of Modern Day Slavery occurring within INS or our supply chain. Whilst we recognise that slavery can exist in any supply chain, we are content that our suppliers work, in the main, in low risk areas and are upholding our values, and the standards expected of the Act.

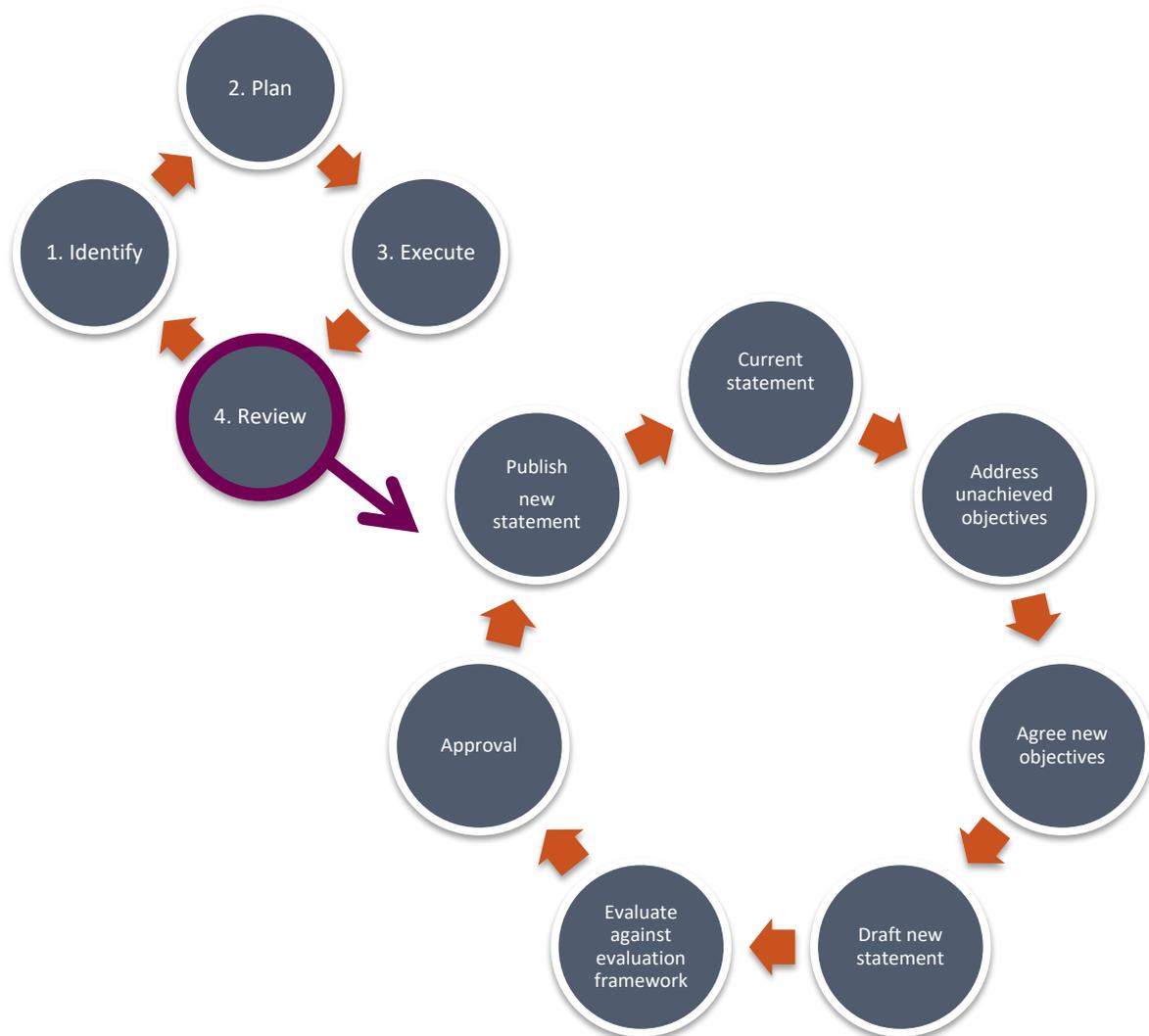
From a geographical perspective, many-of our procurement activities take place in England and our contractors and suppliers are predominantly UK and EU-based with some suppliers based in Japan.

Did we do what we said we would in our 2019/2020 statement?

1. Reporting - *INS will continue to produce an annual statement to disclose the steps we are taking to ensure that slavery and trafficking is not taking place within INS or in any of our immediate supply chain companies.*

Yes, we did. INS continues to use a modern slavery statement evaluation tool; a tool to assess the quality of our modern slavery statements and drive improvement in our statements over time. By tailoring our statements over time, we can focus on the risks that our company faces. The evaluation matrix is structured against the six recommended areas of content taken from the statutory guidance for 'Slavery and Human Trafficking in Supply Chains: Guidance for Businesses.'

The process for writing our annual statement is illustrated below:



2. Modern Slavery Champion - *INS will nominate an Anti-Modern Slavery Champion to monitor our risk and drive improvement in this area.*

Yes, we did. Christina Colgan, a Senior Buyer at INS has been nominated to be the INS Anti-Modern Slavery Champion; someone within the company who will work to promote good practice in this area and high ethical standards.

3. Training - *Modern slavery can be difficult to identify. To help INS identify the signs, we will roll out training for new procurement staff and refresher training for key managers within INS.*

Yes, we did. INS purchased online training on 'modern slavery in the supply chain' which has been rolled out and completed by the INS procurement team (including all new procurement staff and managers).

This online training focused on what to look out for to spot Modern Slavery taking place in the supply chain. Employees learnt what the most vulnerable areas of the supply chain are and what 'red flag' practices to look out for. Individuals were encouraged to provide feedback on the training to the Modern Slavery Champion with the aim of improving future training activities.

Our Head of Risk Management and Modern Slavery Champion have also completed this online training.

4. Modern Slavery Policy - *INS will develop a Modern Slavery Policy which will include additional information on our approach to modern slavery and will be available on our website.*

Yes, we did. INS has written and approved a Modern Slavery Policy which is attached below:



DRS - INS Modern
Slavery Policy - Signe

The policy was developed in conjunction with our sister company, Direct Rail Services Ltd. Learning was taken from both companies to produce a policy that reflects the position of both businesses on the topic of modern slavery and human trafficking.

This policy is published on our website alongside this Modern Slavery Statement, facilitating easy access for external suppliers and stakeholders as well as internal staff.

5. Supplier Questionnaire - *INS will, for those suppliers bidding to provide services classed as high risk of having slavery present, implement a modern slavery*

questionnaire to help us to understand who our suppliers are and learn from their own experiences.

We partly achieved this step. INS has developed a supplier questionnaire which can be adapted for use in audits and supplier engagement. However, INS's newly placed 2019/20 contracts have not been viewed as high risk therefore this questionnaire has not been implemented. INS need to consider how to best use this questionnaire in a manner that is proportionate to the size of the contract, ensuring there are no unnecessary burdens for SME/ VCSE's. INS is currently reviewing and categorising its supply chain and plan to implement this questionnaire with larger, 'gold' category contracts to begin with.

Next Steps

- 1. Reporting** - INS will continue to produce an annual statement to disclose the steps we are taking to ensure that slavery and trafficking is not taking place within INS or in any of our immediate supply chain companies.
- 2. Code of conduct** - INS will develop an Anti-Modern Slavery Code of Conduct which will include additional information on our approach to modern slavery and make this available to INS employees.
- 3. Awareness** - INS will promote awareness of modern slavery using INS communications and by making the code of conduct easily accessible on our intranet.
- 4. Training** - To help INS identify the signs, our newly assigned Modern Slavery Champion will undergo in-depth training and incorporate any learning into our Code of Conduct.

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 2020.



INS Director
for International Nuclear Services Ltd.
Date: September 2020