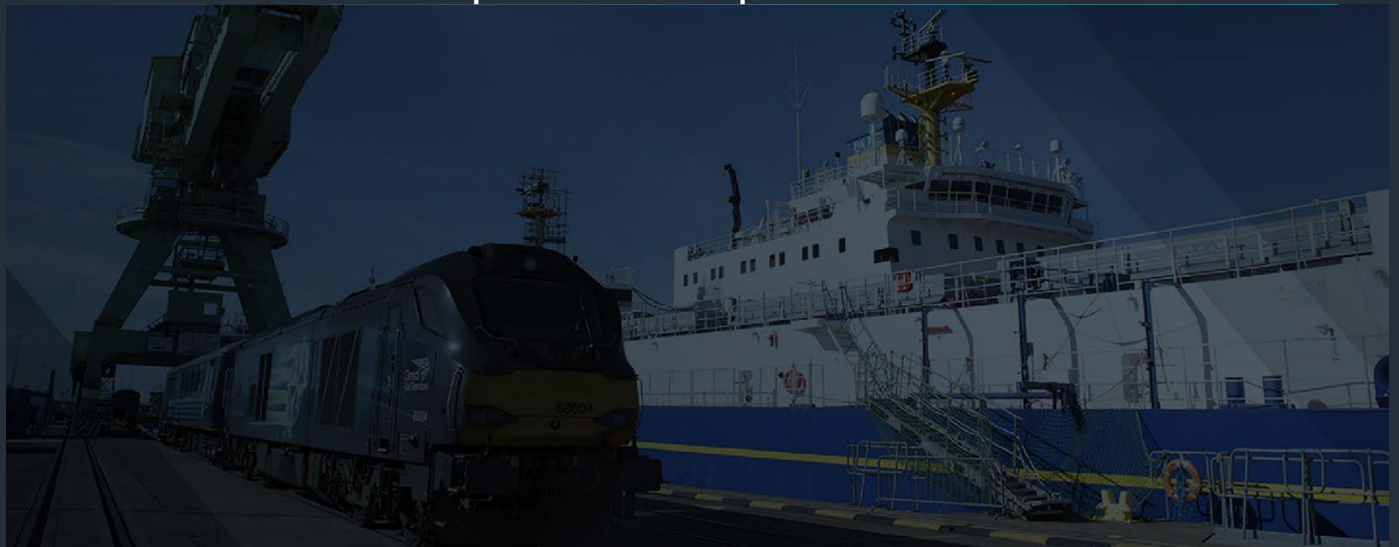


# Nuclear Transport Solutions

# Modern Slavery Act Statement

This statement covers the period between 1 April 2021 and 31 March 2022.



## 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 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?

Launched in April 2021, Nuclear Transport Solutions brought together the three leading UK nuclear transport and logistics companies: PNTL, INS and DRS. Our owner, the Nuclear Decommissioning Authority (NDA) is undertaking the biggest environmental clean-up project in Europe, it will take decades to complete.

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 will 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](http://www.nucleartransportsolutions.com).

## UK and overseas operations



NTS Strategy 5

## Our Suppliers

We have a vast global supply chain, spending £102m with 663 suppliers during Financial Year 2021/2022.

This number reflects a range of suppliers, from one-off small value orders to longer existing contracts and collaborative frameworks. Our largest category of spend is in transport and logistics sector.

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

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 & Procedures

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

- a Code of Conduct
- Whistle-blowing procedures
- 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 and include guidance on compliance as part of our staff inductions.

## 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

applying risk factor scores, to determine, for each contract the level of risk, categorising each; very low, low, medium, high or very high-risk suppliers.

We are currently completing our initial risk assessment, during the next financial year we hope to have a risk assessment undertaken for all our supplier contracts over £25k.

Following completion of the risk assessments, where any contract's assessment results in a score of greater than medium, we will undertake a full audit/review of the circumstances and take any appropriate action required.

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

NTS is an active member of the following NDA Groups:

- LGBT+ Network
- NDA Group Enable Network
- NDA Gender Balance Network
- NDA Race Discrimination Network

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

An Anti-Modern Slavery and Human Trafficking Code of Conduct has been developed for Nuclear Transport Solutions and is available on our internal intranet and include guidance on compliance as part of our staff inductions.

NTS recognise and respect our employees right to join a Trade Union.

## **What have we done so far to address Modern Slavery & Human Trafficking?**

- Appointed a Modern Slavery Champion
- Produce 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 PNTL Tier 1 Suppliers who hold contracts with us over £25k using a segmentation tool.
- Undertaken a high-level risk assessment of our 10 key (by Value) rail suppliers.
- Continue to work with the NDA and 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.
- Include, where appropriate a mandatory pass/fail tender question in our tender pack.
- Using 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.

## **Objectives for 2022/23**

- Refresh all commercial staff training on Modern Slavery by the end of December 2022.
- Produce a guidance note on compliance with the requirements of the Modern Slavery Act at the pre-tender, tender and contract management stages of the commercial lifecycle by 31<sup>st</sup> March 2023.
- Complete the risk-based assessment of DRS Contracts above £25k by 31<sup>st</sup> March 2023 using the segmentation tool.
- Include a section on Modern Slavery for all staff on the Commercial intranet page.

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 financial year ending 31<sup>st</sup> March 2022.

It was approved on 29<sup>th</sup> September 2022 by the NTS Board of Directors who will review the statement annually



**Commercial Director**  
for Nuclear Transport Solutions  
Date: September 2022