



NSG

legacy management

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

We are committed to improving our practices to combat slavery and human trafficking. We are committed to corporate governance, and lawful and ethical behaviour is of paramount importance and critical to our continued success. The NSG 'Standards and Expectations' require all our employees to operate with integrity and transparency in all interactions with clients and all other stakeholders.

We are 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 STRUCTURE

We are 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.

OUR BUSINESS

We have been delivering work programmes in the nuclear industry for over 40 years. Our 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. We provide a diverse service to a broad customer base, ranging from developing facility and site decommissioning and waste management strategies and plans through to mechanical and electrical installation, engineering and land remediation capability. Drawing on our large and experienced team of programme and project managers, scientists, engineers, radioactive waste advisors, health physics monitors and decommissioning operatives, combined with our purpose-built, small- and large-scale trials facilities, we offer integrated life cycle nuclear waste management and site-based decommissioning solutions in the UK.

OUR POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our business or supply chain. Our company values and our Standards and Expectations document reflect our commitment to acting ethically and with integrity in all of our business relationships. This commitment, supported by our Anti-Bribery and Corruption, and Whistle Blowing policies, allied to our supplier assessments, provides controls in identifying whether slavery and human trafficking is taking place anywhere within our business or our supply chain.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Due to the nature of the projects we undertake, we have a limited number of customers but a relatively large supply chain. Our 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, and scientific and laboratory stationery)
- Services (e.g., crane and lifting equipment, IT and communications technologies, logistics and transport, maintenance, repairs and facilities management, marketing services, and media and advertising)
- Subcontract (e.g., professional services and consultancy, construction demolition and decommissioning, fabrication and metalwork, mechanical and engineering, and waste management)

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As part of our initiative to identify and mitigate risk, we have a dedicated Procurement team to manage our relationships with key suppliers. All suppliers are evaluated before being added to our supply chain to ensure we are working with suppliers with similar standards and behaviours.

We have systems in place, within our 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

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure our supply chain and contractors comply with our values, we have a rigorous assessment process. This 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.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chain, we provide training to members of our ESH&Q, Procurement, Commercial, Sales and HR teams.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Ensure our suppliers with a turnover of above £36,000,000 have a statement on their website
- Educate smaller suppliers in high-risk areas on their responsibilities to prevent modern slavery where applicable
- Ensure that all relevant employees are exposed to modern slavery awareness training via our Learning Management System

FURTHER STEPS

Following a review of the effectiveness of the steps undertaken during the financial year ending March 2022, to ensure that there is no slavery or human trafficking in our supply chains, we intend 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 potential processes that identify, prevent and address the risk of modern slavery in our supply chains
- Develop a 'Supplier Code of Conduct' for issue to our supply chain

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending **31 March 2022**.*



Jim Porter, Managing Director