



# NSG

legacy management

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

NSG Environmental Ltd is committed to improving its practices to combat slavery and human trafficking. NSG is committed to corporate governance, and lawful and ethical behaviour is of paramount importance and critical to its 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, and places similar obligations upon its suppliers.

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 STRUCTURE

NSG Environmental Ltd provides engineering and decommissioning services in the nuclear sector. It is a part of the NIS Group of Companies and its ultimate parent company is NIS Holdings Ltd. NIS Holdings Ltd's head office is in the United Kingdom. The Group has under 250 employees in the UK and a global annual turnover of above £36m.

### OUR BUSINESS

Our business provides three main types of services:

#### *Consultancy Services*

Our Consultancy Services team has a reputation for delivering pragmatic solutions and high-quality outputs on time and to budget.

#### *Engineering Solutions*

We have successfully supported numerous decommissioning and waste management campaigns with practical engineered solutions.

#### *Site Operations*

We operate within some of the UK's most hazardous facilities, collaborating with our clients and supply chain partners to deliver safe and cost-effective solutions.

### OUR SUPPLY CHAINS

Our supply chains can roughly be classified as concentrated chains as we have few customers but a relatively large supply chain. The suppliers we utilise varies depending on the projects we are undertaking for the client, although these supply chains can be broken into three main areas:

- Material suppliers (e.g. builders' merchants, hand and small tools, health physics 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.)

NSG Environmental Ltd

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Company number: 2769182 (registered in England)

- Subcontract (e.g. professional services and consultancy, construction demolition and decommissioning, fabrication and metalwork, mechanical and engineering, waste management, etc.)

We have reviewed our supply chain against categories of supply most prone to employing slavery and human trafficking practices (e.g. cleaning services, hospitality, construction, PPE supply, etc.) to identify potential risk areas.

## **OUR POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our company values and our Standards and Expectations document reflect our commitment to acting ethically and with integrity in all 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 in our supply chains.

- Anti-Bribery and Corruption
- Whistle Blowing
- Standards and Expectations

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk, we have a dedicated Procurement team to manage the 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 to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a rigorous assessment process. All of our key suppliers undergo an evaluation assessment. This assessment covers equal opportunities and diversity, as well as business and professional standing which requires compliance to the Human Rights Commission and Modern Slavery Act.

We have a dedicated compliance (ESH&Q) team, with input from the following departments:

- Commercial
- Audit and Compliance
- Human Resources
- Procurement
- Sales

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, 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 to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Ensure all of 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.

## FURTHER STEPS

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Continually evaluate ways to heighten awareness of modern slavery concerns.
- Examine potential processes that identify, prevent and address the risk of modern slavery in our supply chains.

*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 2020**.*



Jim Porter, Managing Director