



# NOMINET

## MODERN SLAVERY STATEMENT

### Introduction from Chair and CEO

Nominet is strongly opposed to all forms of slavery and human trafficking and is committed to ensuring these do not exist in our organisation or supply chains. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We have implemented policies and procedures to manage the way we procure goods and services to keep our supply chains robust. To date we have had no reports of modern slavery, human trafficking or child labour within our organisation nor our supply chains.

This statement provides some background to our organisation and our supply chains. It also sets out the policies we had in place during the financial year ended 31<sup>st</sup> March 2023 to prevent corruption, slavery, human trafficking and child labour from taking place in our organisation.

### Our organisation

Nominet UK is a company limited by guarantee registered in England and Wales. It is the parent company of a group of subsidiaries and during FY23 the group consisted of seven subsidiaries that support our range of activities.

Our activities are overseen by our Board of Directors who have ultimate **responsibility for all that we do**. Nominet's day-to-day management resides with the Executive leadership team which reports directly to the Board of Directors. Alongside the activity described in this statement, we comply with all national laws for the territories we operate in.

### Our supply chain

We use suppliers to support the operations of our organisation. The key areas in which we engage suppliers are:

- Communications service providers
- Consulting
- Facilities
- Finance and investment management
- Legal
- Managed telecommunications service providers
- Marketing and public relations
- Operations

- Professional services and contingent workforce
- Software support vendors
- Telecommunications infrastructure and hardware suppliers

## Our policies and procedures

We operate a number of policies and procedures which reflect our commitment to acting properly in all our business relationships and to implementing and enforcing effective systems and controls. They apply to all our employees and to anyone engaged on a temporary basis.

- Whistleblowing policy – which provides guidance on how to report suspected dangers or wrongdoing in the workplace.
- Anti-bribery policy – which sets out our requirements for conducting all of our business in an honest and ethical manner by adopting a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.
- Procurement policy – which requires us to purchase goods and services from suppliers that act with integrity and behave responsibly with regards to the environment and society whilst meeting our business needs. The policy requires that we select suppliers that comply with Anti-Slavery legislation.
- Health and Safety policy – a key aim of which is to ensure the wellbeing of all our employees and anyone else who may be affected by our activities.
- Risk Management, Business Continuity and operational policies – which are designed to promote operational resilience and to keep all our activities in line with applicable laws, regulations, and codes of governance (including in relation to slavery and human trafficking).
- HR procedures – we check that all our staff have appropriate right to work documents and ensure they are paid fairly, and receive a competitive remuneration package.
- Equality, diversity and inclusion policy – which is designed to help ensure that all our staff and anyone that we fund is treated with both dignity and respect and has appropriate routes to escalate any concerns.
- Environmental policy and reporting – designed to ensure sustainability and minimise our impact on the environment.

We will continue to review and develop our policies to ensure that they are effective and appropriate.

## Due Diligence

In line with the requirements of the Modern Slavery Act we have identified the areas within our business and supply chain that have the highest risk profile with regards to modern slavery and human trafficking. These are:

- Procurement – modern slavery can occur in a supply chain through inadequate or inappropriate procurement practices. Our supply chain consists mainly of services rather than goods, with the highest risk areas being associated with our office maintenance activity.
- Service delivery partners – modern slavery can occur in a service delivery supply chain through inadequate controls or lack of oversight. The highest risk areas are our overseas operations in higher risk countries.

We have identified the main risks in respect of these key areas and put measures in place to mitigate them. These include:

- Maintaining an effective Procurement Policy and procedure
- Screening potential suppliers and partners using pre-qualification and onboarding questionnaires, and where appropriate, credit rating and "financial distress" checks
- Supplier and partner performance and due diligence evaluations
- Ensuring we have the correct checks and balances in our recruitment process

During the reporting period we instructed an independent external auditor to assess the probity of our financial accounts and were audited regularly throughout the year by independent external auditors to ensure our compliance with the three ISO certifications that we hold; ISO20000, ISO22301 and ISO27001.

Our due diligence activity into suppliers has raised no concerns relating to the prevention of slavery, trafficking and child labour in our business or supply chain.

### Risk assessment and management

During the reporting period we continued to use the Social Responsibility Alliance's Slavery & Trafficking Risk Template (STRT). The STRT is a standardised open-source template that can be used to capture slavery and human trafficking-related risk and compliance data.

We continue to develop and use our slavery and human-trafficking risk assessment process to help us identify areas within our operations and supply chain that may be at risk of human trafficking or slavery.

### Key performance indicators

Nominet's KPIs have been developed to enable the business to measure its overall performance as a business. Care is taken to ensure that the KPIs set do not encourage malpractice of any type.

We will continue to review how we monitor the effectiveness of our approach to ensuring the prevention of slavery, trafficking and child labour in our business and supply chain. Our current methods include:

- Supply chain due diligence on suppliers that gathers information relating to policies and procedures to ensure responsible business practice; completion rates are tracked and responses logged
- Employee training records that capture details on completion rates for training and awareness activities; completion rates are tracked and action taken where training has not been completed
- Quarterly Audit & Risk Committee meetings; updates on risk assessments and compliance activities are shared and further actions agreed where needed

## Training and Awareness

Information and training is provided to all our employees, contractors, and visitors on relevant matters. The following are examples of the information and training provided:

- All new joiners follow an induction programme which includes information and guidance on where to find our policies
- All new joiners are required to undertake specific Business Continuity, GDPR, Health and Safety, and Information Security training
- Additional anti-bribery training is provided to staff on a targeted basis focussing on those that handle business negotiations, events and higher risk activities
- Our managers are provided with a range of leadership training and are assisted by our HR team in HR related matters including in relation to recruitment, remuneration and employee wellbeing

## Our Achievements

In our previous Modern Slavery Statement for FY22 we committed to focus on the following:

- A Procurement Review Board that brings Procurement, Legal, Security, Enterprise Architecture and Risk together to carry out supplier due diligence and supply chain risk assessments
- Refresh the information we hold on our suppliers relating to their policies and controls for the prevention of slavery, human trafficking and child labour

We are pleased to share the progress we have made on these commitments.

During the financial year ending 31<sup>st</sup> March 2023 we invested in our procurement function via the appointment of a Head of Procurement who will drive further professionalism in our procurement practices. We also strengthened the supplier due diligence processes run by the Procurement Review Board, and broadened the scope of activity to include due diligence where contracts are being renewed or the scope of work is being extended. We refined our supplier questionnaires to keep them up-to-date, simplify them and make them easier to understand.

We maintained the information we hold on suppliers relating to their policies and controls for the prevention of slavery, human trafficking and child labour.

We further embedded procurement activity within our wider supply chain risk management and matured the associated risk reporting.

The effectiveness of our activities to combat slavery and human trafficking is monitored to ensure we are targeting our activities in the right places.

## Our commitment to combating slavery and human trafficking

During the current financial year ending 31<sup>st</sup> March 2024, we will continue to deliver our programme of due diligence activity and make further improvements including:

- The introduction of a new Supplier Environmental, Social and Corporate Governance (ESG) Policy
- The formal addition of ESG related elements to the RFP scorecard

We will continue to monitor and report on existing areas of risk and identify and investigate any potential new risk areas as they arise. We will continue engagement across our business to share and learn insights about mitigating Modern Slavery risks including:

- Refreshed training and awareness materials providing guidance on procurement practises for employees and managers with direct responsibility for supply chain management
- All new managers will undertake our *Being a Manager* leadership training with refreshers for our existing manager community
- Continued KPI reporting

#### Other activities

We remain proud of our longstanding relationship with the Internet Watch Foundation (IWF) and during the reporting period we have worked closely with them to tackle the presence of child sexual abuse content hosted on .UK domain names. We also continue to partner with law enforcement agencies to suspend domains used for criminal activity. This work together with anti-phishing initiatives such as Domain Watch help to tackle pernicious activity and remove funding sources supporting organised crime. Collectively these responses demonstrate our commitment to tackling online criminal activity including human trafficking, that may be operating in the .UK namespace.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes **Nominet's** modern slavery and human trafficking statement for the financial year 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023.