



# NOMINET

## MODERN SLAVERY STATEMENT

### Introduction from Chair and Company Secretary

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 obtain 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 2021 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 consisting 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
- Finance and Investment Management
- Legal
- Managed telecommunications service provider
- Software support vendors
- Telecommunications infrastructure and hardware suppliers
- Facilities

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- Consulting
  - Operations

## **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 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 that they are paid fairly and enjoy a competitive remuneration package.
- Equality 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:

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- 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 deliver 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:

- Reviewing and refreshing of our 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. No concerns were raised 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.

Whilst a wider range of performance indicators will be considered in the future, the main methods of monitoring effectiveness are:

- 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



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- Quarterly Audit & Governance 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 attend an induction session 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 FY20 we committed to focus on the following:

- Publishing an updated Procurement Policy that includes guidance on and references to modern slavery
- Full deployment of a vendor management tool that will enable us to centrally track due diligence on, and declarations from, our suppliers on matters including anti-slavery, trafficking, and child labour measures
- Providing company employees and managers with direct responsibility for supply chain management training on how to minimise the risk of human trafficking and slavery
- Development of KPIs to measure progress against reducing these risks, i.e. KPIs to measure how successfully we have formalised our supply chain due diligence and contractual controls

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

During the financial year ending 31<sup>st</sup> March 2021 we strengthened our supplier management and procurement processes by fully deploying our vendor management tool and refreshing our corporate procurement policy. The Nominet Group procurement policy now requires that we vet suppliers to ensure compliance with Anti-Slavery legislation.

Information and awareness raising activities were undertaken to ensure that our people are familiar with the new procurement policy requirements, and have the tools and knowledge with which to complete effective risk assessments on matters relating to human trafficking and slavery.

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Performance reporting has been developed that enables the effectiveness of our activities to combat slavery and human trafficking to be assessed.

### **Our commitment to combating slavery and human trafficking**

During the current financial year ending 31<sup>st</sup> March 2022, we will continue to develop our programme of due diligence activity including:

- Extension of supplier due diligence using our vendor management tool to digitally track supplier policies and controls relating to the prevention of slavery, human trafficking and child labour
- Integration with our supply chain risk reporting

We will continue to monitor and report on existing areas of risk and to 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 for employees and managers with direct responsibility for supply chain management
- Continued KPI reporting and focus on development of new KPIs to measure how effective our controls are

### **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 2020 to 31<sup>st</sup> March 2021.**