



## MODERN SLAVERY STATEMENT

### Introduction from Chair and CEO

Nominet remains strongly opposed to all forms of slavery and human trafficking and is committed to ensuring these do not exist in our organisation or supply chain. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We have policies and procedures in place to manage our procurement activities to ensure our supply chain is robust, resilient and delivering goods and services ethically. To date we have had no reports of modern slavery, human trafficking or child labour within our organisation nor our supply chain.

This statement provides some background to our organisation and our supply chain. It also sets out the policies we had in place during the financial year ended 31<sup>st</sup> March 2024 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 FY24 the group consisted of seven subsidiaries that support our range of activities.

Activities are overseen by our Board of Directors who have ultimate responsibility for all that Nominet does. Day-to-day management responsibilities sit 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 have a suite 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 – sets out how employees can raise concerns over issues which are in the public interest such as criminal activity, improper conduct or unethical behaviour.
- Anti-Bribery policy – sets out our requirements for conducting all 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 safety 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 our activities compliant 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 outlines our commitment to provide quality, equity, fairness and respect for everyone in our employment.
- Sustainability policy and reporting – which sets out our commitments, responsibilities, and arrangements for minimising 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. The highest risk areas

in our supply chain are associated with our office maintenance activity, and the purchase of electronic equipment which may originate from countries with lower employment standards than in the UK.

- 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

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), adopting the refreshed template that has been published. 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 monitor the effectiveness of our activities to ensure the prevention of slavery, trafficking and child labour in our business and supply chain. Our current methods include:

- 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. Examples of the information and training provided are:

- 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
- Subject Matter Experts (SMEs) and managers can refresh and maintain their knowledge via the self-service learning and development resources we provide to our employees

## Our Achievements

In our previous Modern Slavery Statement for FY23 we committed to focus on:

- The introduction of a new Supplier Environmental, Social and Corporate Governance (ESG) Policy
- The formal addition of ESG related elements to the RFP scorecard
- To continue to monitor and report on existing areas of risk and identify and investigate any potential new risk areas as they arise
- To 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

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

During FY24 we invested in our procurement function with the appointment of a Procurement Manager, to support the Head of Procurement, who will increase the team's ability to support the business with effective and controlled procurement practices. We also refined the supplier due diligence processes run by the Procurement Review Board and the associated supplier questionnaires.

We started a refresh of our Procurement Policy and have begun work to understand the requirements for a new Supplier Environmental, Social and Corporate Governance (ESG) Policy. We have also refined the RFP scorecard.

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

Our new managers have been enrolled into the company's leadership training and various refresher sessions have been held for existing managers through FY24.

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 2025, we will continue to deliver our programme of due diligence activity and make further improvements including:

- The deployment of a new Supplier Environmental, Social and Corporate Governance (ESG) Policy
- New training modules relating to identifying unethical practices and refresher training on Nominet's policies relating to preventing bribery, corruption and malpractice in procurement
- Additional internal audits with a broader and deeper scope
- A review of our supplier due diligence platform/tools and the alternatives available with a recommendation to the business on the solution that will best support our environmental and social issues due diligence

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 guidance on procurement practises for employees and managers with direct responsibility for supply chain management
- Continued KPI reporting

### **Other activities**

We remain proud of our longstanding relationship with the Internet Watch Foundation (IWF) and during FY24 we 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 2023 to 31<sup>st</sup> March 2024.**